

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5, LCD, RCRA Branch, LR-8J
77 W. JACKSON BLVD.
CHICAGO, IL 60604

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

SITE NAME: ArcelorMittal Burns Harbor LLC
EPA ID NUMBER: IND003913423
ADDRESS: 250 W US HWY 12, Burns Harbor, Indiana 46304-9745
DATE OF INSPECTION: June 16 and June 21, 2011
EPA INSPECTOR: Sue Rodenbeck Brauer

PREPARED BY:

Sue Rodenbeck Brauer March 9, 2012 3/27/12
Date SRB

ACCEPTED BY:

Paul Little 3-29-12
Chief, CS #2 Date

Purpose of Inspection

This inspection was a component of the multimedia federal inspection of the ArcelorMittal Burns Harbor LLC facility (ArcelorMittal), including onsite contractors. This inspection report contains an evaluation of ArcelorMittal's compliance with hazardous waste regulations found at 329 IAC Article 3.1. Hazardous Waste Management Permit Program and Related Hazardous Waste Management and Article 13 Used Oil Management and the Code of Federal Regulations (CFR). I performed the inspection with John Gierczak of Region 5's Cleveland Office. The inspection was a federal lead RCRA Compliance Evaluation Inspection (CEI).

Participants

Sue Rodenbeck Brauer, U.S. EPA Chicago Office
John Gierczak, U.S. EPA, Westlake, Ohio Office

Site Representatives:

Jeffrey May, Environmental Compliance Assurance Coordinator
Environmental Maintenance, Environmental & Utilities, ArcelorMittal

Introduction

I arrived at the ArcelorMittal Environmental Building after 8:00 a.m. I had been participating in the multimedia inspection that began on June 13, 2011 and had temporary use of a facility access card. I met EPA inspectors and ArcelorMittal staff at the Environmental Building onsite. We previously introduced ourselves, presented our inspector credentials and identification, and exchanged business cards. Mr. May drove us in an ArcelorMittal truck to the known used oil storage sites outside the ArcelorMittal integrated mill buildings.

Site Description

ArcelorMittal Burns Harbor is situated on Lake Michigan and adjacent to Burns Harbor. The facility is apparently built on fill, as it juts out into the lake from the relatively smooth shoreline of Lake Michigan's southern basin. To the east, a groin protects the made land. To the west, the harbor has vertical steel walls and is protected by a breakwater. Landward (south), numerous beach ridges mark the location of former shorelines. The facility is adjacent to the Indiana Dunes National Lakeshore.

The steelmaking processes are well explained in an American Iron and Steel Institute publication (online at www.steel.org/Making%20Steel/How%20Its%20Made/) and in the ArcelorMittal multimedia and RCRA inspection reports. According to RCRAInfo (RCRARep-accessed 6/8/11), ArcelorMittal's current federal RCRA activities include: corrective action, hazardous waste large quantity generator, underground injection, universal waste large handler (accumulates batteries, lamps, and mercury containing equipment), and marketer to off-spec used oil burner.

Site Tour

We toured the site observing used oil containers and used oil tanks. I took photographs of many processing and storage units during the inspection. See Attachment A. After the tour, I referred to the "Active Oil Tank Map" in the ArcelorMittal SPCC plan for the locations of recorded tank numbers. Also after the tour, I referred to the "Evacuation Map" in the Hazardous Waste

Contingency Plan which has door numbers. The table below summarizes my observations of the used oil storage units and secondary containment during the tour. The "Location" names are taken from plan sheets ArcelorMittal staff provided onsite to the EPA inspectors. If present in the table, door numbers were noted at the time photographs were taken.

Location	Door #	Container #	Photo #	Labeled "used oil?" (Y/N)	Visibly Leaking? (Y/N)	Comments
Machine shop		MS02007	002 003	Y	Can't tell	2 cut steel slabs on pavement adjacent to tank, a former roll off box with a welded date of 10/11/1976. Mr. May doesn't know how people put used oil inside; we would have to ask inside about sources. The nature of secondary containment cannot be observed without moving the steel slab, something we are not equipped to do.
Locomotive and Mobile Equipment Shop	0026	MS02004	004 005	Y	N	Adjacent to door. Note hose from building. Top flap open. Low liquid level inside. Mr. Gierczak inferred that oil is removed from the top.
North of Locomotive Shop		MS02003	006 007 008	Y	Can't tell	Container in puddles and under building vent (possibly condensed steam or rain). Sheen on puddles adjacent to building. Oily grime on exterior.
North of Locomotive Shop			009 010	NA	NA	Totes, on welder's truck, of Ecolube hydraulic fluid (product oil) on flat bed.
Coal Conveyor Powder Building J	0023		011	No used oil	No used oil stored	Oil storage pad may be used for virgin or used oil. Some oil sheen on water in containment.

Location	Door #	Container #	Photo #	Labeled "used oil?" (Y/N)	Visibly Leaking? (Y/N)	Comments
West of Coke Battery, east of Coal Powder Bldg.			012	No used oil	No used oil stored	Stinky area. Oil storage pad with NALCO 7468, Lubriplate, Mobil Grease XHP 005. Four "oil" drums with product labels on horizontal cradle; drums very corroded. Two purple drums labeled "new oil." Spill of unkown material appears black on light gray coarse gravel.
Between coke oven receiving door & E-W railroad.	1001	CO01019	013 014 015	Tank-Y Drum-N	Can't tell	Aboveground tank, descriptively ½ above ground. Adjacent sump to south a separate receiving tank or secondary containment-could not discern. Shallow sump between photographer and tank cover. Extra machinery parts or scrap scattered about. 1 drum used oil labeled "used grease."
Sinter plant			016 017 018 019 020	All N	N	Inside fenced storage pad with sump (017). Products: Quintolubric 88846, Hydraulic oil FR-40, Superplex grease, Houghtosafe 419-R, Cosmolubric, Omaha Oil 460 Synthetic. Drum labeled "waste" and "save." Drums labeled "460" (new or used 460? drums look old). Slip hazard. 1 drum , 1 tote, & two 1 gal. containers labeled "waste oil."

Location	Door #	Container #	Photo #	Labeled "used oil?" (Y/N)	Visibly Leaking? (Y/N)	Comments
Boiler House No. 1			021	Y	N	Products stored: Shell Tellus oil, Turbo T Oil 32, IRUS Fluid C, Omala Oil 220. 3 yellow used oil drums.
Oil House south of Levy, BOF	3060 3062		none	No used oil	No used oil	Waste oil area was empty.
Lake Water Pump Station #1			022	Y	N	2 Black drums labeled "used oil." Used oil label 1/2 off.
007 Bldg.			none	Y	Can't tell	Lilac-colored used oil tank. Wet floor.
(Lunch break)						
Waste Water Pump Station #1; two tanks; Oil Removal Bldg. & roll-off container		PU08008 PU08009 PU08007	023	N N Y Can't tell	Mr. May later described PU08008 and PU08009 as empty. He did not state why they are empty. An API chain and scraper oil-water separator is inside the oil removal building. The oil flows over a weir or roll onto a slide and into the outside roll-off container. Oil is in the roll off secondary containment.
Roll Shop or Tractor Shop		MS02001	024 025	Y	N	Black horizontal tank hard-piped from inside. On roll-off box base P53-50482-20.
160" Plate Mill	7023A	PM05003	026	Y	N	Red, elongated metal box on a pad with berms. Looks like one box upside down on top of another. Mr. May thinks the white thing sticking up from the tank is an oil level indicator. Two red drums are not used oil.

Location	Door #	Container #	Photo #	Labeled "used oil?" (Y/N)	Visibly Leaking? (Y/N)	Comments
Hot Strip Mill scale pit area	21 22	HM-P08 HM06032	027 028	Y Y	May be spraying. See vertical support left of tank & pipe, especially color change from top down	Vertical 6000 gallon tank steam venting from pipe near ground; tank top also steaming. Metal box (a tank) also contains used oil, capacity 900 gallons. Box receives oil from vertical tank. Messy with scale and oil/water. Can see edge of concrete pad in photos.
Hot Strip Mill scale pit area		HM- 07 031	029 030 031	Y Y	Y Y	Vertical 6000 gallon tank, rusting. Oil at base. Metal box capacity also contains used oil. Very messy with scale and oil/water so that labeling is not entirely legible. Edges of concrete pad not visible.

Record Review

I reviewed the "Active Oil Tank Map" in the ArcelorMittal SPCC plan for the locations of recorded tank numbers. Also, I referred to the "Evacuation Map" in the Hazardous Waste Contingency Plan which has door numbers. The table above includes information typically included on a used oil management standards checklist. On June 21, 2011, I reviewed tracking records from Power and Utilities, made available for review by Teri Kirk of Arcelor Mittal. Three tracking records were photographed (photos 043, 044, and 045).

Closing Conference

Mr. Gierczak and I summarized the "used oil" labeling and releases of used oil problems observed during the inspection. The multimedia inspection continued into the next week.

Inspection Followup

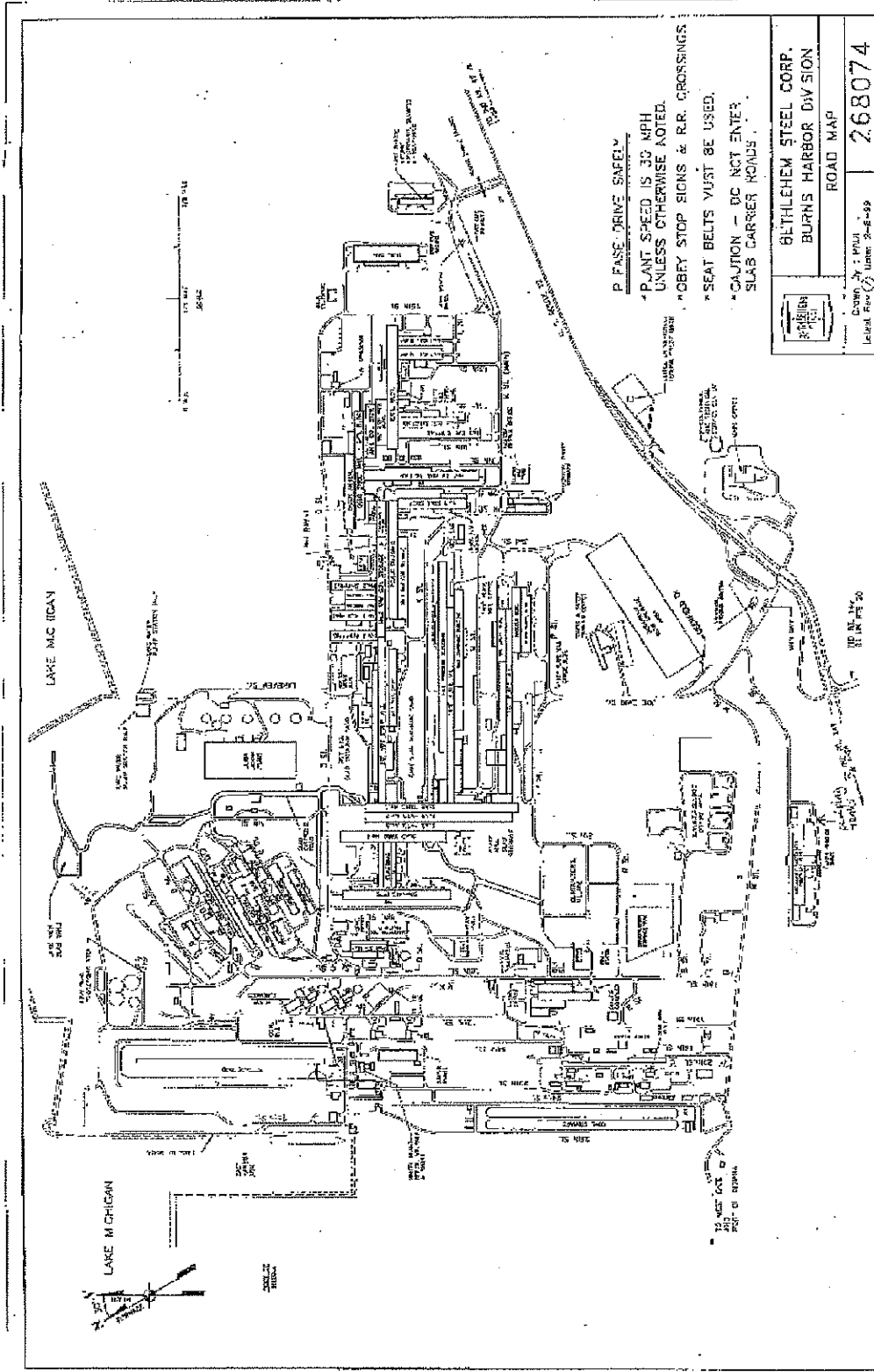
Mr. May provided photographs documenting ArcelorMittal's response to inspection comments. The photos taken are identified with his brief description in Appendix C.

Attachments

- A. Site map with Inspector Notes
- B. Photographs
- C. Inspection Follow Up

ATTACHMENT A

Site Map



- * PLEASE DRIVE SAFELY
- * RAMP SPEED IS 30 MPH UNLESS OTHERWISE NOTED.
- * OBEY STOP SIGNS & R.R. CROSSINGS
- * SEAT BELTS MUST BE USED.
- * CAUTION - DO NOT ENTER SLAB CARRIER ROADS

	BETHLEHEM STEEL CORP.	
	BURNS HARBOR DIVISION	
ROAD MAP		268074
Drawn by: J. M. H. J. Initial Rev: (1) Issue: 2-6-59		

6. Case in History?

ATTACHMENT B

Photographs

ArcelorMittal Burns Harbor LLC, EPA ID Number IND003913423
Photographs taken by Sue Brauer using Canon PowerShot SD790 IS Digital Elph

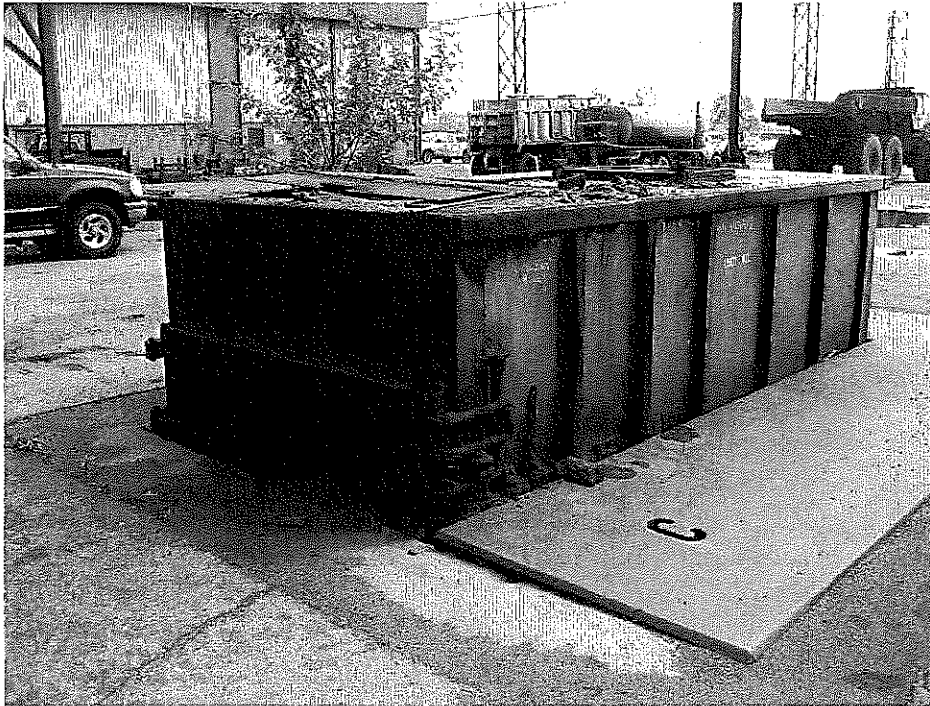


Photo 002. June 16, 2011, 8:29 a.m. Oil container MS02007 at SS & TM, South Used Oil Tank South of Machine Tank Shop. Not used oil in SPCC plan. Cannot observe condition of tank and secondary containment due to adjacent steel slabs.



Photo 003. June 16, 2011, 8:29 a.m. Oil container MS02007 at the Machine Shop. Cannot observe condition of tank and secondary containment due to presence of steel slabs.



Photo 004. June 16, 2011, 8:37 a.m. Oil container MS02004 (5,184 gallons) at the Locomotive and Mobile Equipment Shop, SS & TM West Green Used Oil Tank West of Locomotive Shop.



Photo 005. June 16, 2011, 8:37 a.m. Oil container MS02004 (5,184 gallons) at the Locomotive and Mobile Equipment Shop, SS & TM West Green Used Oil Tank West of Locomotive Shop.



Photo 006. June 16, 2011, 8:42 a.m. Container MS02003 (5,184 gallons), SS & TM North Green Used Oil Tank North of Locomotive Shop (Outside between doors 076N and 075).



Photo 007. June 16, 2011, 8:44 a.m. Container MS02003 (5,184 gallons), SS & TM North Green Used Oil Tank North of Locomotive Shop (Outside between doors 076N and 075).

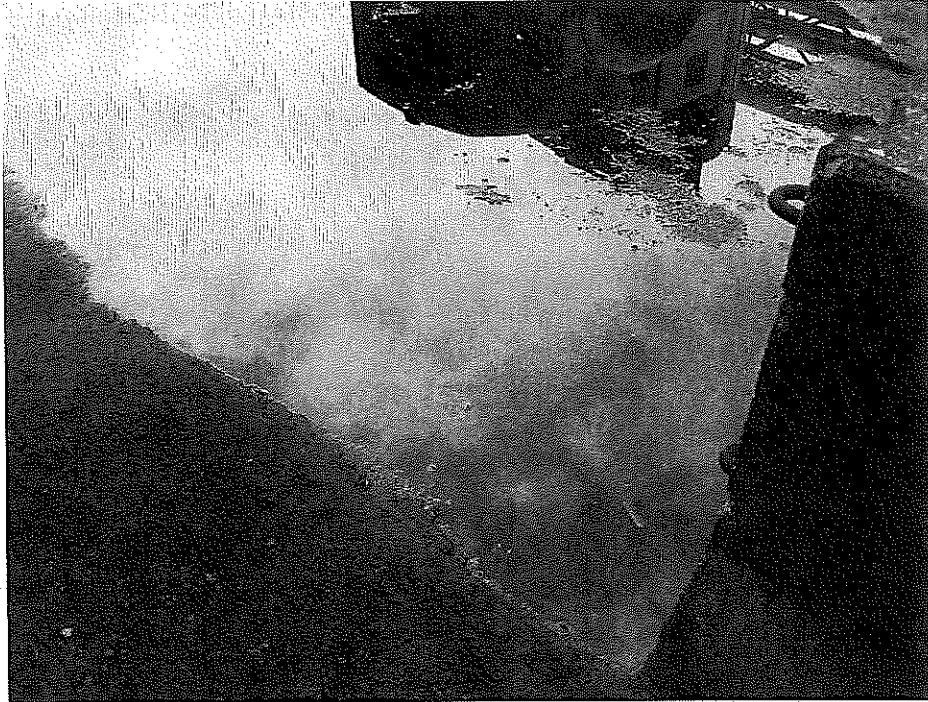


Photo 008. June 16, 2011, 8:45 a.m. Oil sheen on puddle.

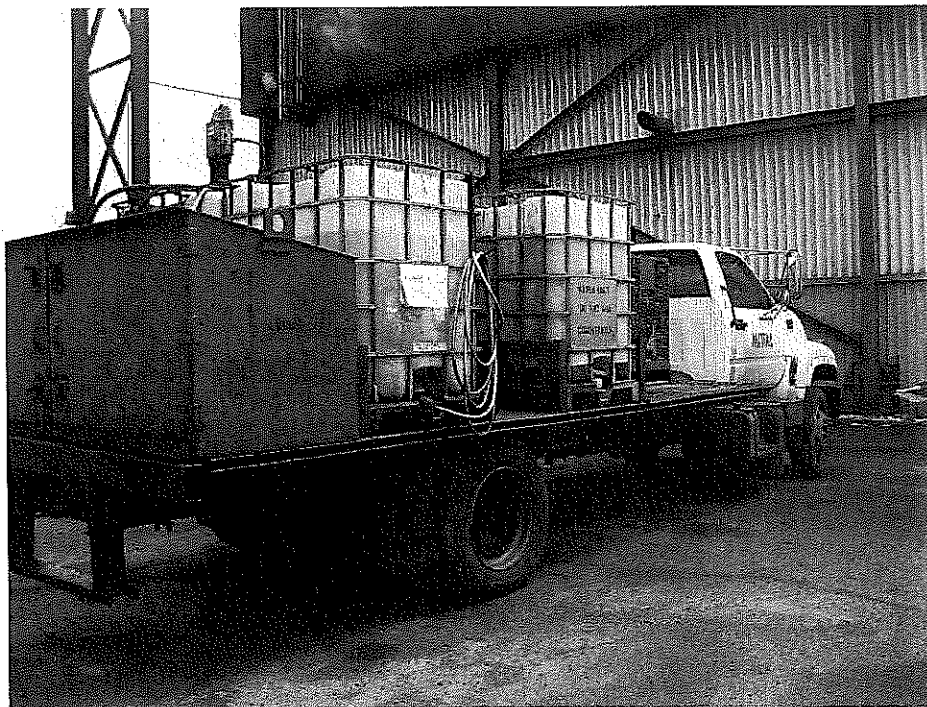


Photo 009. June 16, 2011, 8:50 a.m. This welding truck is loaded with hydraulic fluid totes on a flat bed.

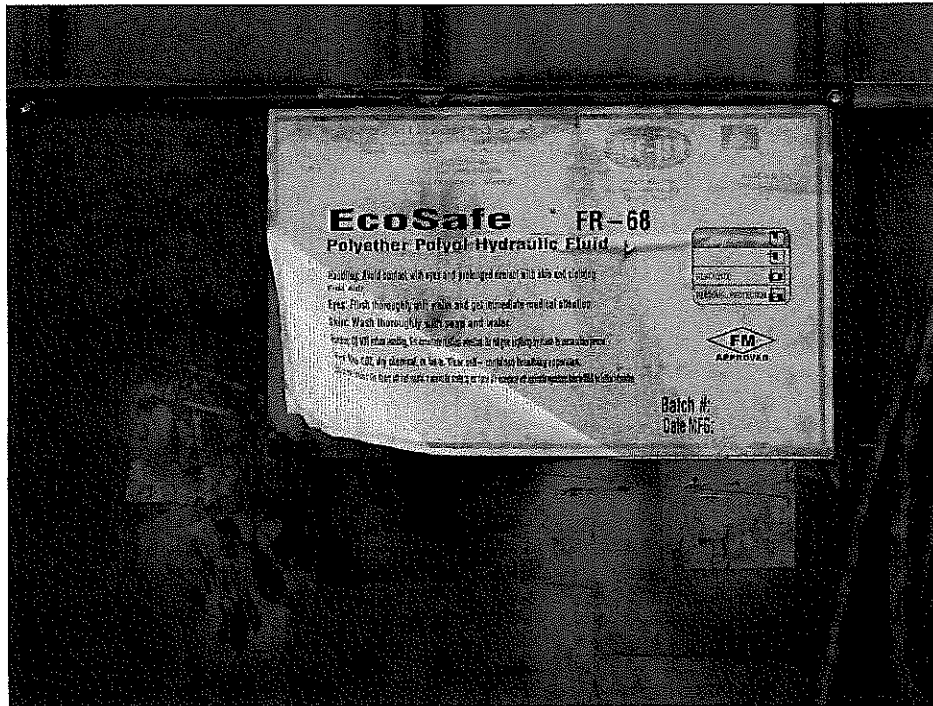


Photo 010. June 16, 2011, 8:50 a.m. This is a product label on the flat bed truck shown in photo 009. This tote is to the left in photo 009.

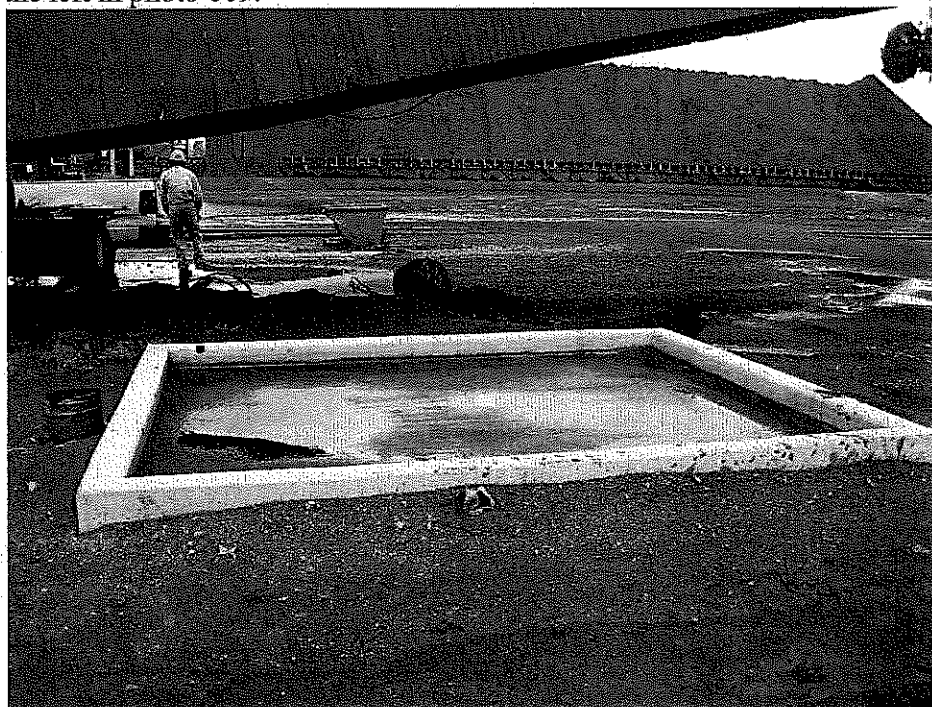


Photo 011. June 16, 2011, 9:06 a.m. Oil storage pad at Coal Conveyor to Powder Building J. Near door 0023. An oil sheen is on water in the containment. Looking west.

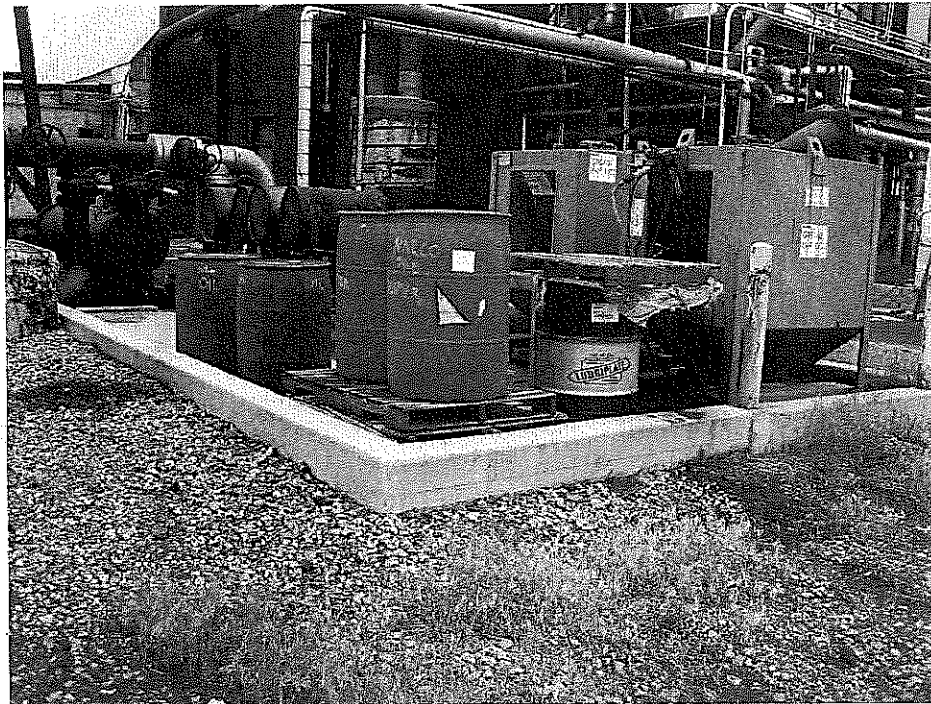


Photo 012. June 16, 2011, 9:06 a.m. West of Coke Battery, east of Coal Powder Building, looking southeast. These are product containers. Note stains on gravel and on berm.



Photo 013. June 16, 2011, 9:16 a.m. Tank CO01019, Coke Ovens Waste Oil Storage Tank, west of main mechanical shop, with sump and drum pad, located between coke oven receiving door 1001 and railroad, looking west.



Photo 14. June 16, 2011, 9:16 a.m. Sump south of and adjacent to tank CO01019, looking west.



Photo 015. June 16, 2011, 9:17 a.m. Drums on pallet, on drum pad north of tank CO01019, looking west.



Photo 016. June 16, 2011, 9:30 a.m. Fenced storage pad at Sinter Plant, looking east-northeast.

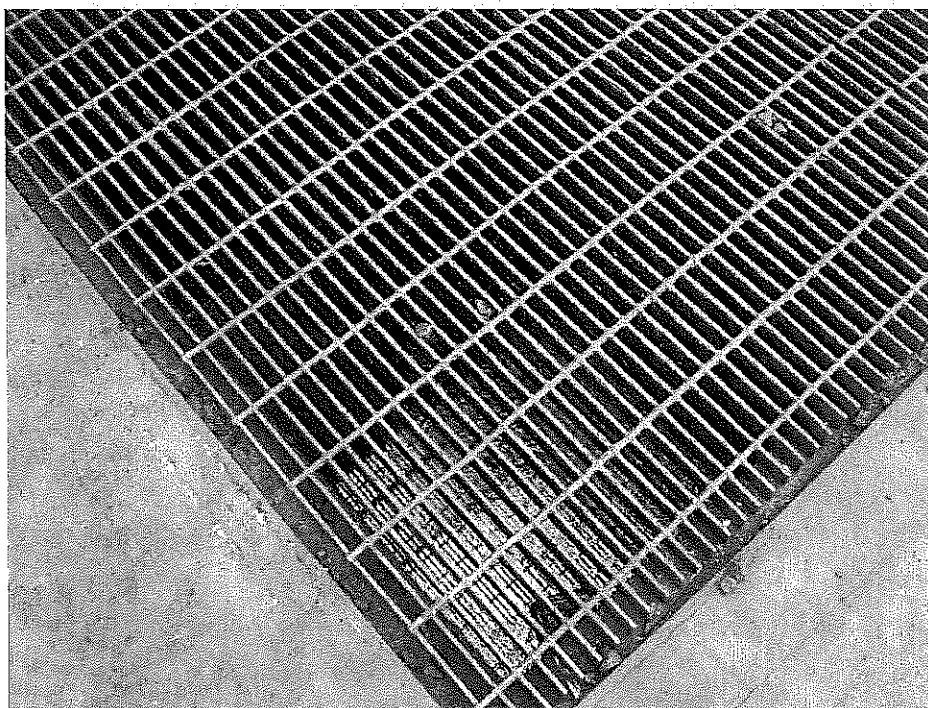


Photo 017. June 16, 2011, 9:30 a.m. Fenced storage pad sump, at Sinter Plant.



Photo 018. June 16, 2011, 9:32 a.m. Drums within the fenced storage pad at the Sinter Plant. Rusting, dented drum labeled "460."



Photo 019. June 16, 2011, 9:32 a.m. Fenced storage pad near Sinter Plant. Drum with multiple dents marked "3-13," "SAVE," and with an "X" on a dent. Note oil on floor.



Photo 020. June 16, 2011, 9:36 a.m. Fenced drum storage pad near the Sinter Plant, looking southwest at containers labeled "Waste Oil."



Photo 021. June 16, 2011, 9:48 a.m. Drum storage area at Boiler House Number 1, looking south. Drums contain product and used oil (3 yellow drums).



Photo 022. June 16, 2011, 10:08 a.m. Drum storage shed at Lake Water Pump Station #1. "Used oil" label is half off.



Photo 023. June 16, 2011, 12:46 p.m. The Oil Reclamation Building is in the center, and the container on the right receives oil from an API separator. Tanks PU08008 and PU08009 are in the right background. Waste Water Pump Station Number 1 is in the left background. Looking northeast.



Photo 024. June 16, 2011, 12:57 p.m. Oil storage container MS02001 (1,763 gallons) located at SS & TM Tractor Shop. Used Oil Tank East of Tractor Shop in Parking Lot.



Photo 025. June 16, 2011, 12:58 p.m. Oil storage container MS02001 (1,763 gallons) located at SS & TM Tractor Shop. Used Oil Tank East of Tractor Shop in Parking Lot.

025

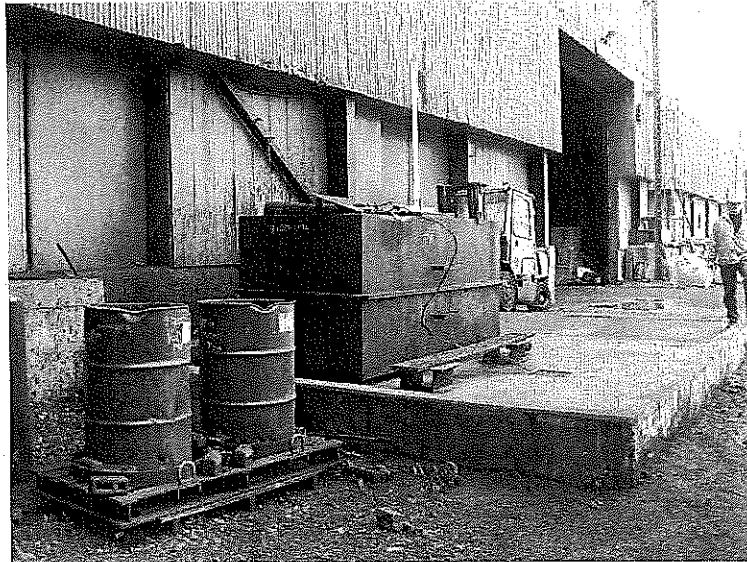
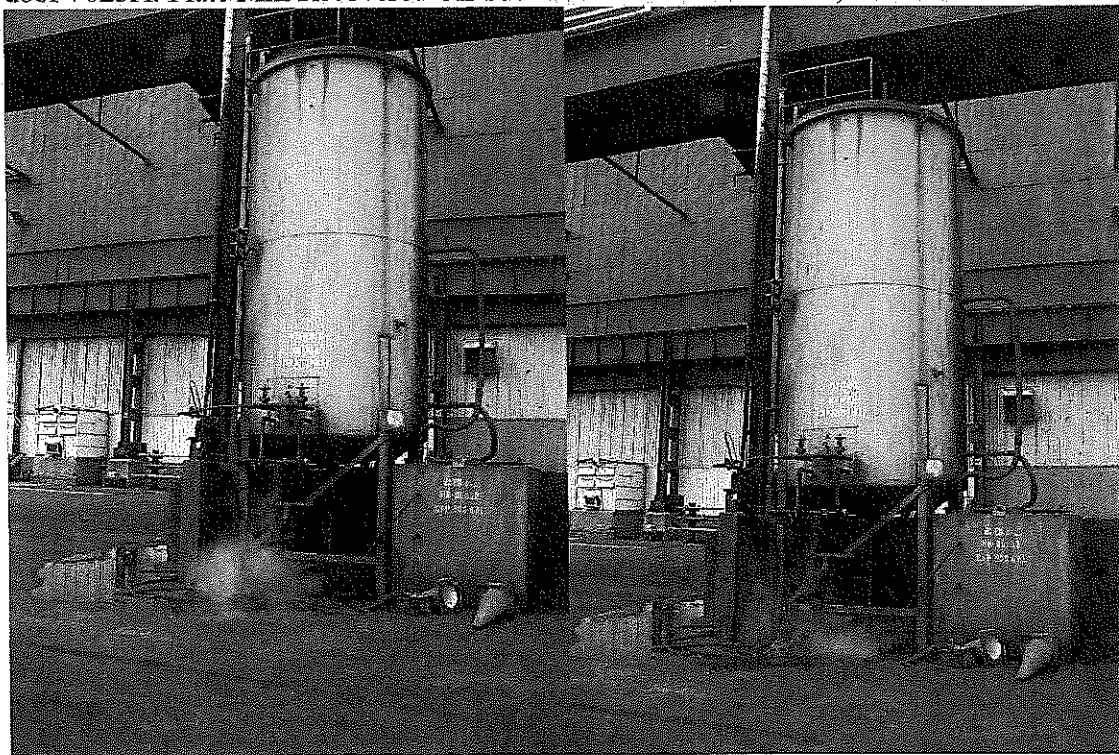


Photo 026. June 16, 2011, 1:08 p.m. Tank PM05003 (2,000 gallons) located at the 160" Plate Mill near door 7023A. Plate Mill Recovered Oil 160" Mill – East of Scale Pit, Outside.



Photos 027 (left) and 028 (right). June 16, 2011, 1:17 p.m. Used oil tank HM-P08 with a capacity of 6,000 gallons. Hot Mill West used oil separator, west of 501 Oil House, West of Door 5007. West-most of two waste oil separators. Metal box to the right (HM06032) has a capacity of 900 gallons, received from tank HM-P08.

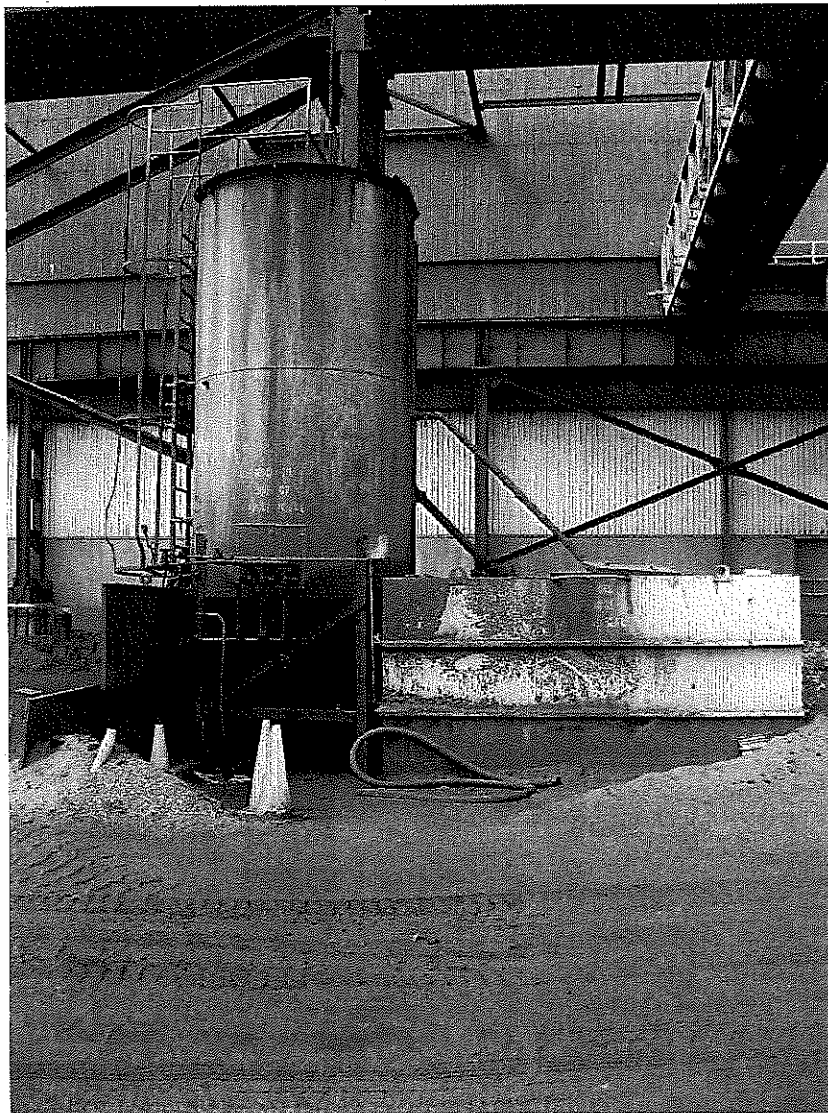


Photo 029. June 16, 2011, 1:19 p.m. Used Oil Tank HM-_07 (6,000 gallons) and container __031 (illegible gallons). Hot Mill East Used Oil Separator. West of 501 Oil House, West of Door 5007, east-most of two waste oil operations.

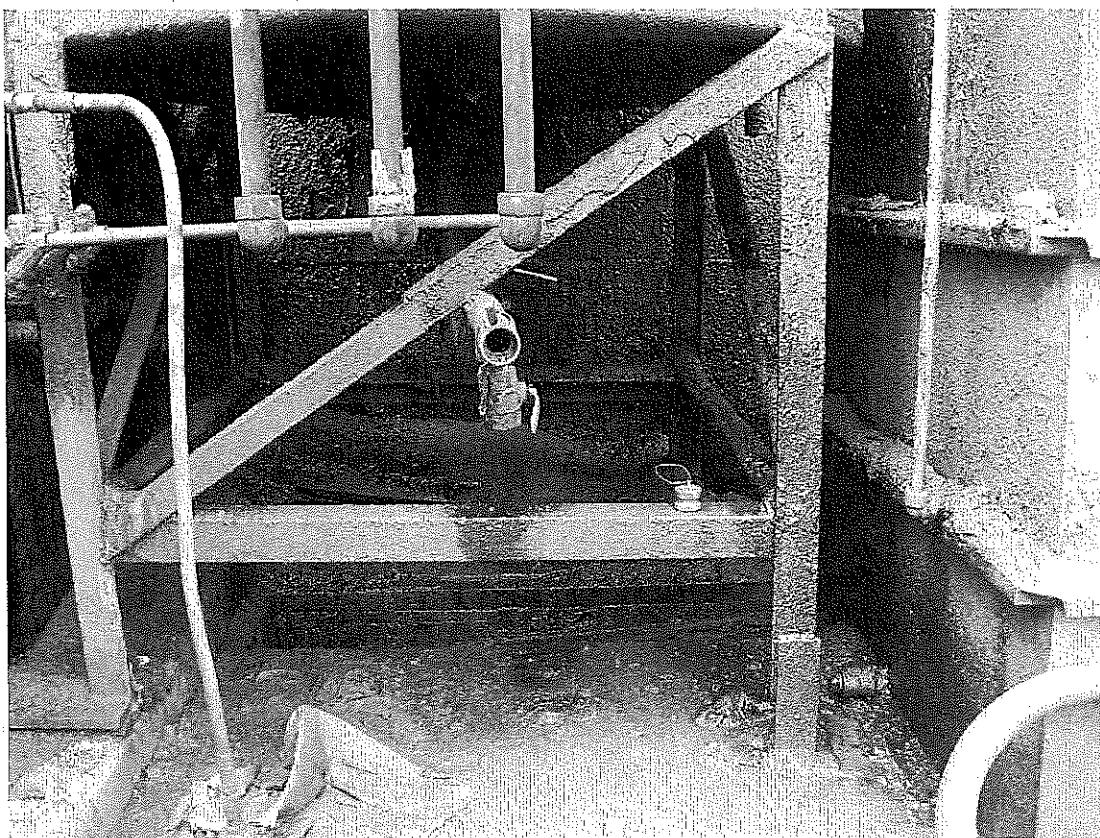


Photo 030. June 16, 2011, 1:20 p.m. Below Used Oil Separation Tank HM-P07, Hot Mill East Used Oil Separator. Used Oil Tank HM06031, on the right, has a 2,500 gallon capacity.



Photo 031. June 16, 2011, 1:21 p.m. Used Oil Container HM06031(capacity 2,500 gallons according to the SPCC plan). Hot Mill East Used Oil Tank, West of 501 Oil House, West of 5007, East-most of two waste oil operations.

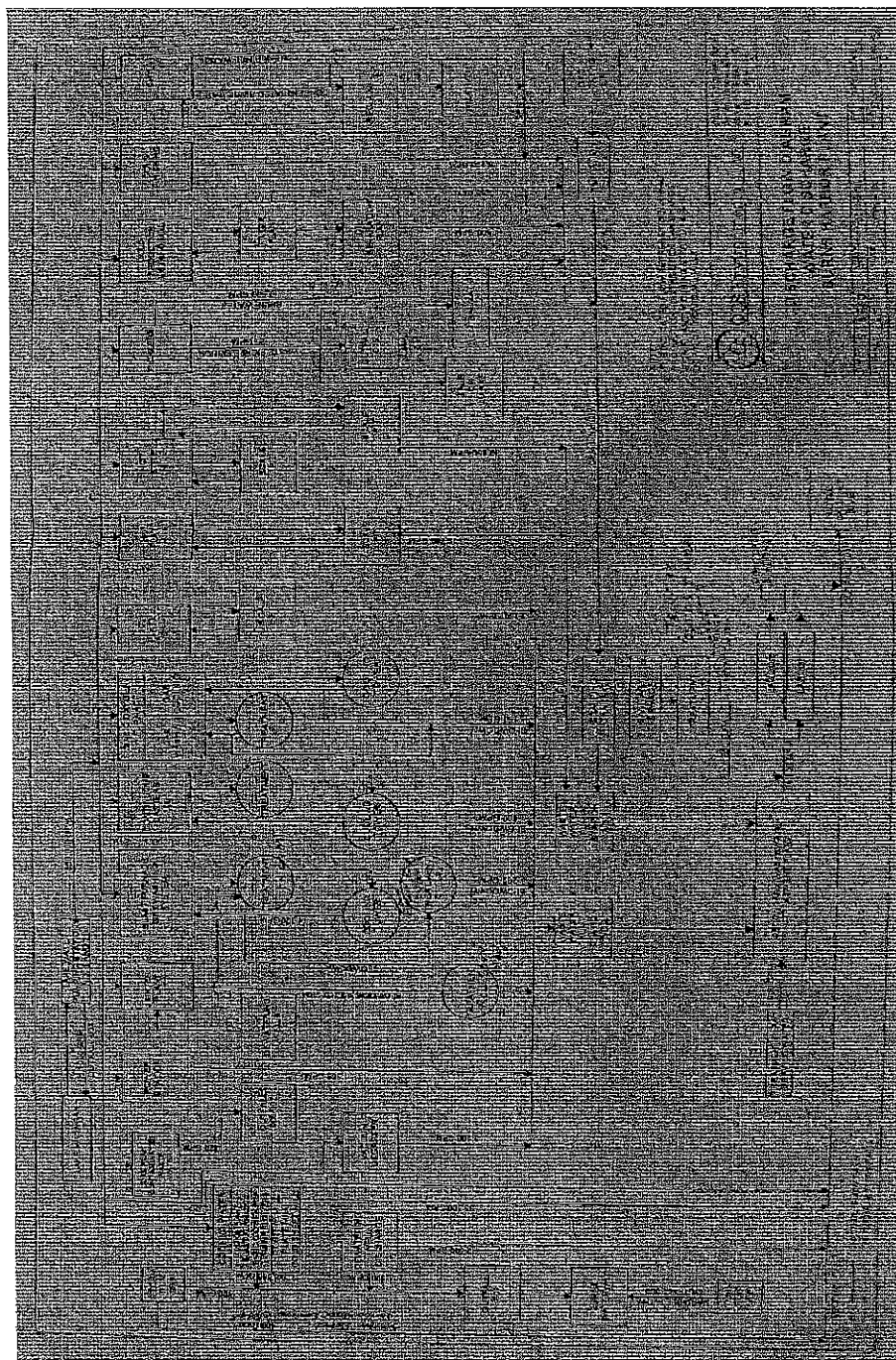


Photo 041. June 20, 2011, 8:54 a.m. Waste water flow schematic provided by ArcelorMittal to U.S. EPA inspectors during the June 2011 multimedia inspection.

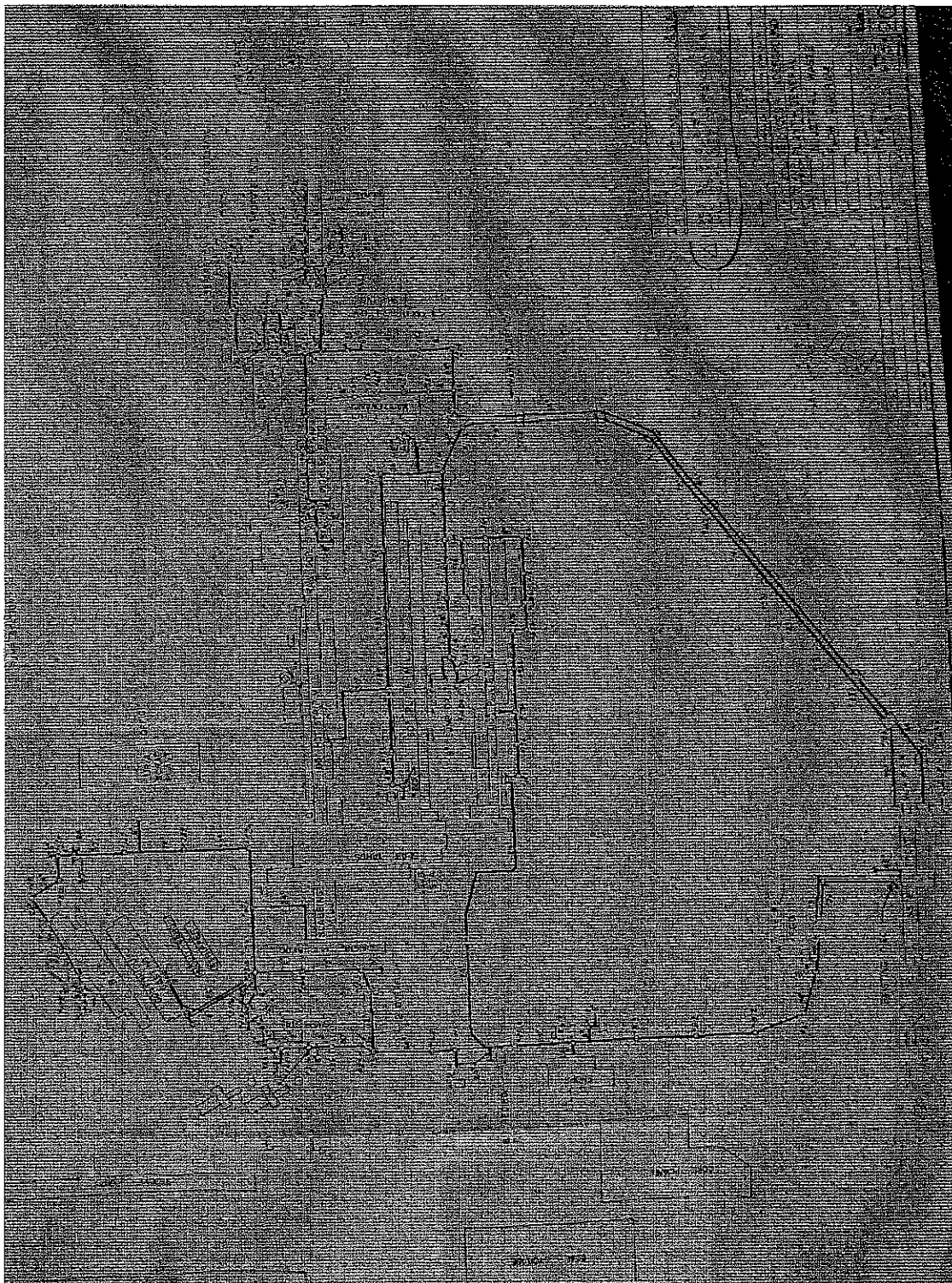


Photo 042. June 20, 2011, 1:45 p.m. Industrial Waste Flow Diagram provided to U.S. EPA inspectors during June 2011 multimedia inspection.

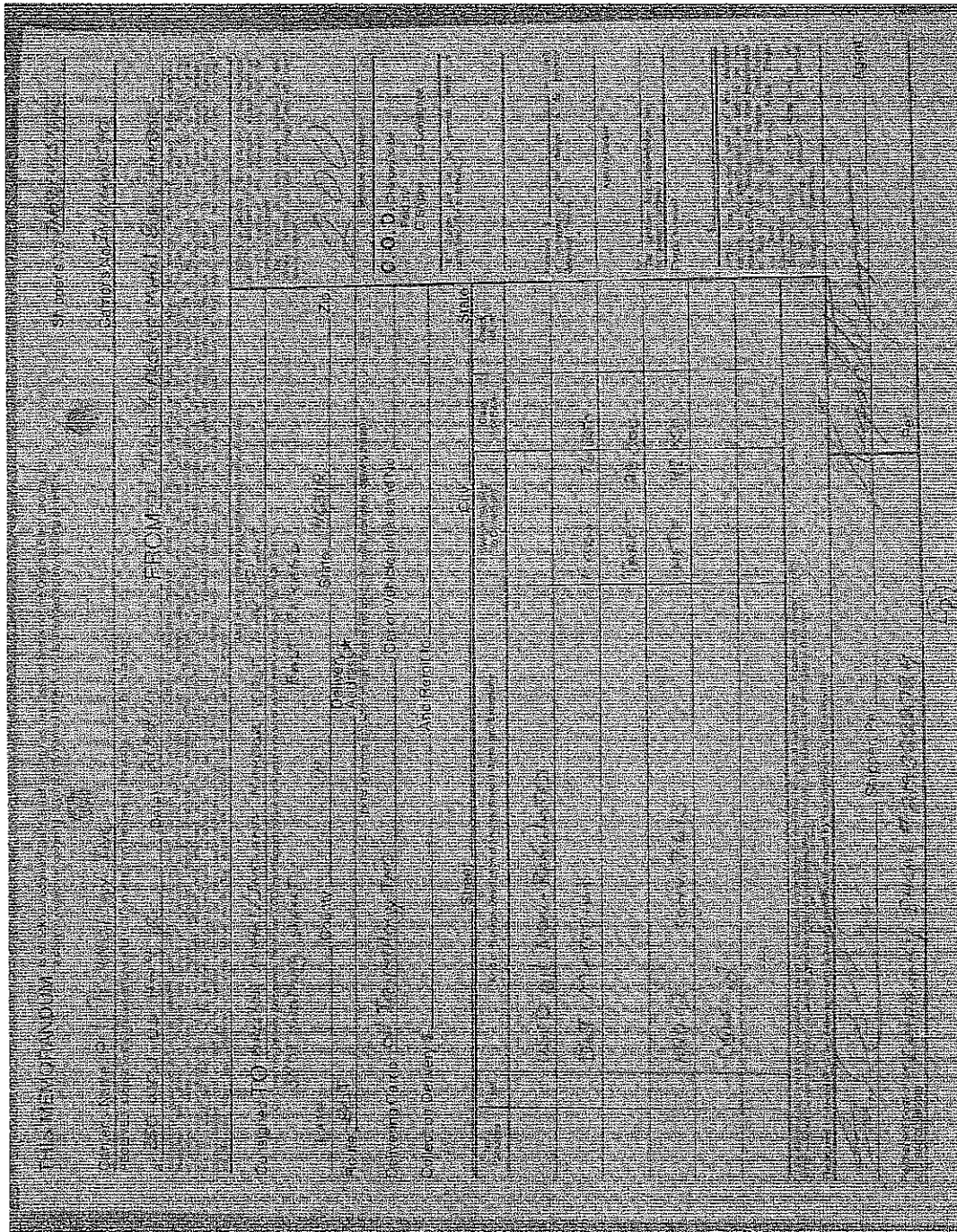


Photo 043. June 21, 2011, June 21, 12:53 p.m. Photo of tracking records for 2/24/11 used oil shipment from Oil Technology, Inc. c/o ArcelorMittal Burns Harbor to ArcelorMittal/Indiana Harbor East at 3210 Watling Street, East Chicago, Indiana.

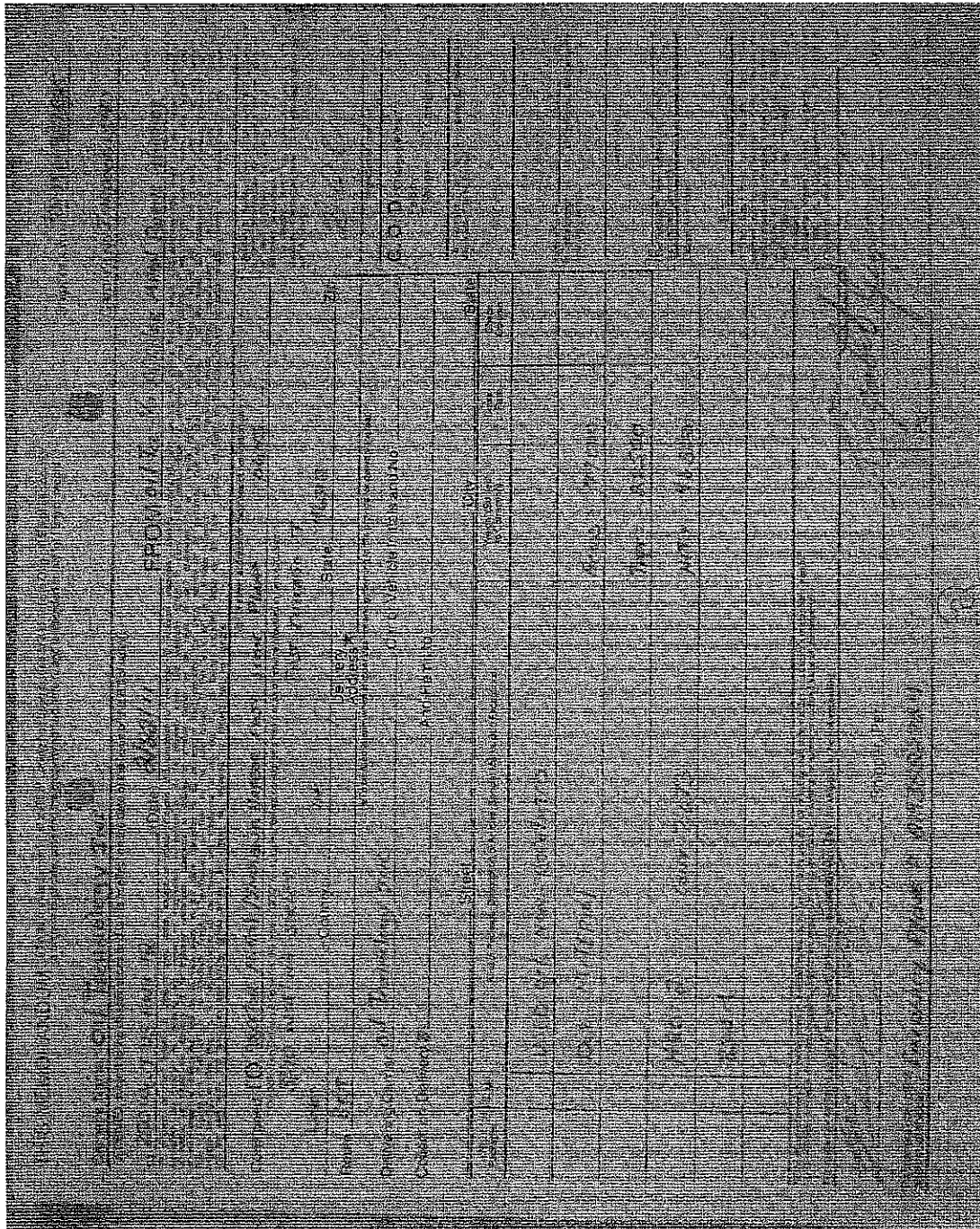


Photo 044. June 21, 2011, 12:54 p.m. Photo of tracking record for 2/22/11 shipment of used oil from Oil Technology, Inc. c/o ArcelorMittal Burns Harbor to ArcelorMittal/Indiana Harbor East, 3210 Watling Street, East Chicago, Indiana.

RECEIVED BY: <u>ARCEROL MITTAL</u> DATE: <u>12/30/10</u> TIME: <u>12:54 PM</u>		FROM: <u>Oil Technology, Inc.</u> TO: <u>ARCEROL MITTAL</u> ADDRESS: <u>3210 WATLING STREET</u> CITY: <u>EAST CHICAGO</u> STATE: <u>IN</u> ZIP: <u>46427</u>	
PRODUCT: <u>IRON</u> QUANTITY: <u>10000</u> UNIT: <u>TONS</u>		ORDER NO.: <u>10000</u> INVOICE NO.: <u>10000</u> DATE OF DELIVERY: <u>12/30/10</u>	
DRIVER: <u>JOHN</u> TRUCK NO.: <u>10000</u> TANK NO.: <u>10000</u>		GROSS WEIGHT: <u>10000</u> NET WEIGHT: <u>10000</u> TARE: <u>10000</u>	
RECEIVED BY: <u>ARCEROL MITTAL</u> DATE: <u>12/30/10</u> TIME: <u>12:54 PM</u>		FROM: <u>Oil Technology, Inc.</u> TO: <u>ARCEROL MITTAL</u> ADDRESS: <u>3210 WATLING STREET</u> CITY: <u>EAST CHICAGO</u> STATE: <u>IN</u> ZIP: <u>46427</u>	
PRODUCT: <u>IRON</u> QUANTITY: <u>10000</u> UNIT: <u>TONS</u>		ORDER NO.: <u>10000</u> INVOICE NO.: <u>10000</u> DATE OF DELIVERY: <u>12/30/10</u>	
DRIVER: <u>JOHN</u> TRUCK NO.: <u>10000</u> TANK NO.: <u>10000</u>		GROSS WEIGHT: <u>10000</u> NET WEIGHT: <u>10000</u> TARE: <u>10000</u>	

Photo 045. June 21, 2011, 12:54 p.m. Tracking record dated 12/30/10 from Oil Technology, Inc. c/o ArcelorMittal Burns Harbor to Arcelor/Mittal/Indiana Harbor East, 3210 Watling Street, East Chicago, Indiana.

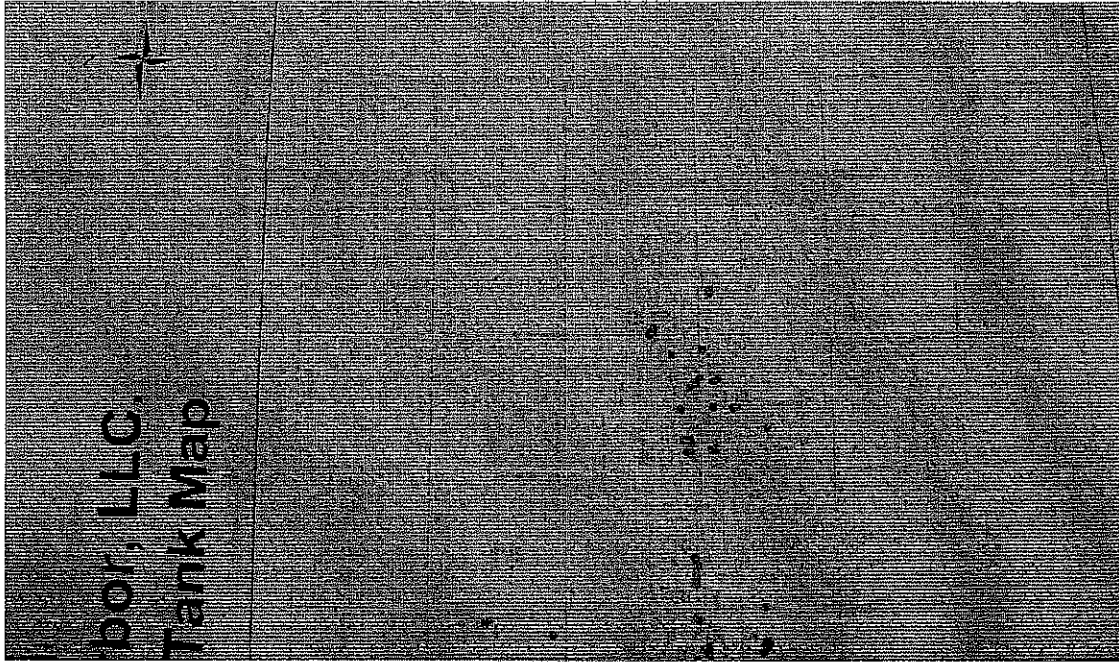


Photo of right side of Active Oil Tank Map from SPCC plan. June 21, 2011, 11:21 a.m.

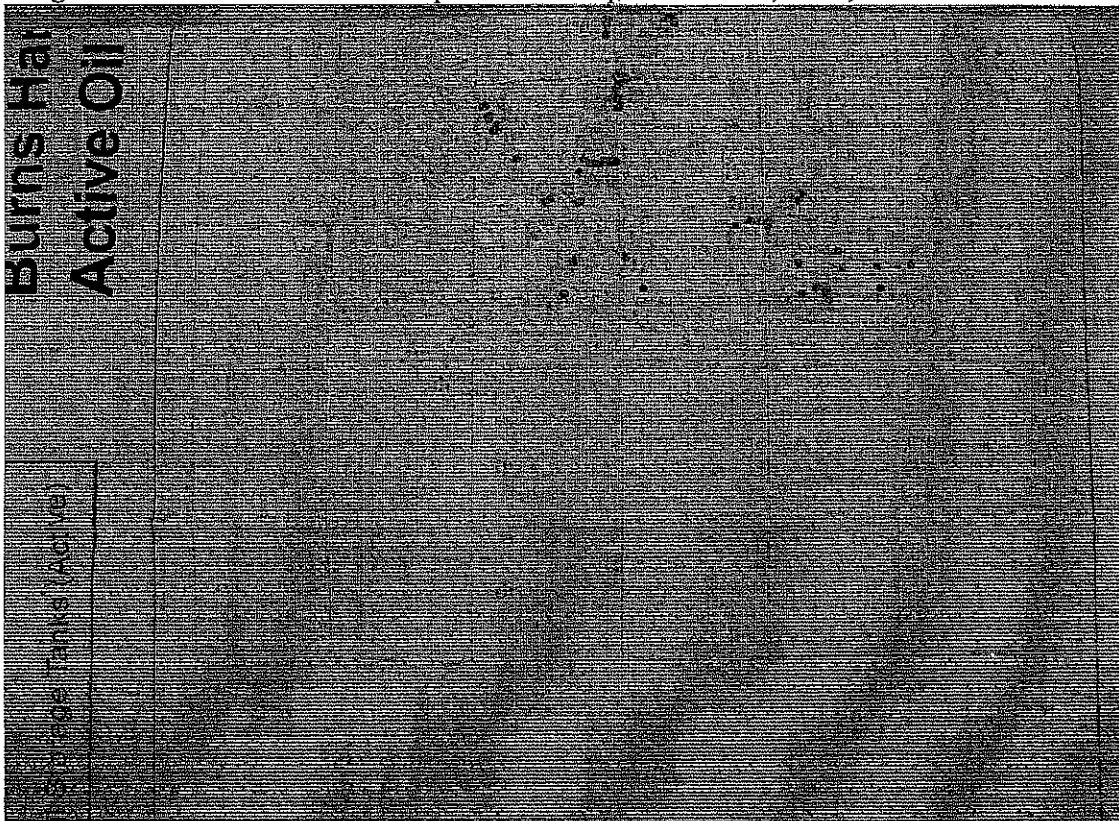


Photo of left side of Active Oil Tank Map, June 21, 2011, 11:20 a.m.

ATTACHMENT C

Inspection Follow-up

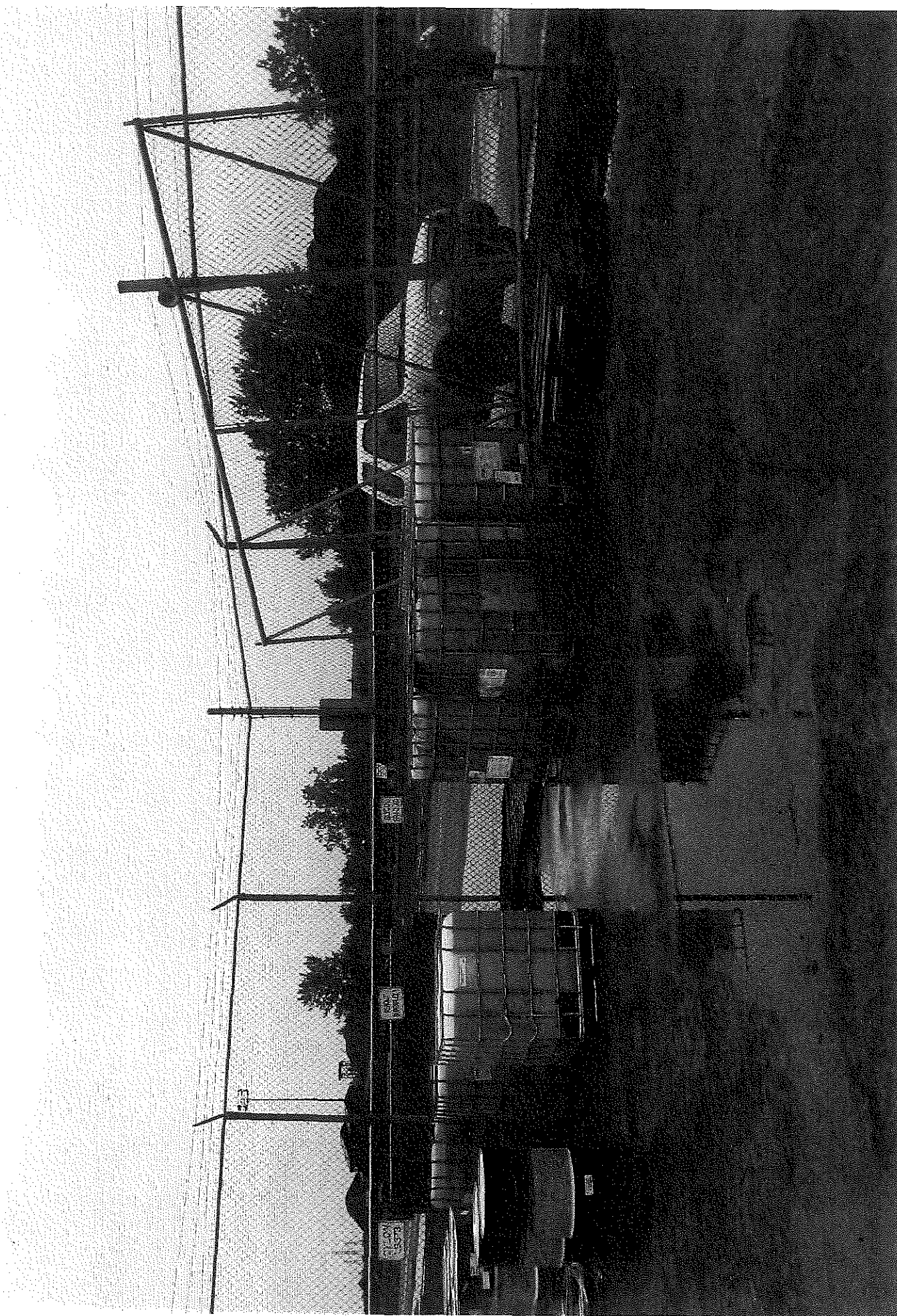
PHOTO IDENTIFICATION

During the EPA inspections the week of 6/13/11, several items were noted and some follow-up photos were taken to indicate that actions were completed to address the concerns. The photos taken are identified below with a brief description .

- 1) 6-20-11 Oil storage at the Sinter Plant – incorrect labeling
- 2) 6-17-11 B.O.F. oil storage – mislabeled
- 3) Lake water pump house – spcc tank not identified
- 4) 6-17-11 Hot Strip scale pit East tank # 06031 – tank housekeeping
- 5) 6-20-11 Hot Strip scale pit East tank # 06031 – 1st day clean-up
- 6) 6-21-11 Hot Strip scale pit East tank # 06031 - 2nd day clean-up

6-2-11 Oil Storage Sinter Plant

①



6-17-11 BOF OIL Storage

2

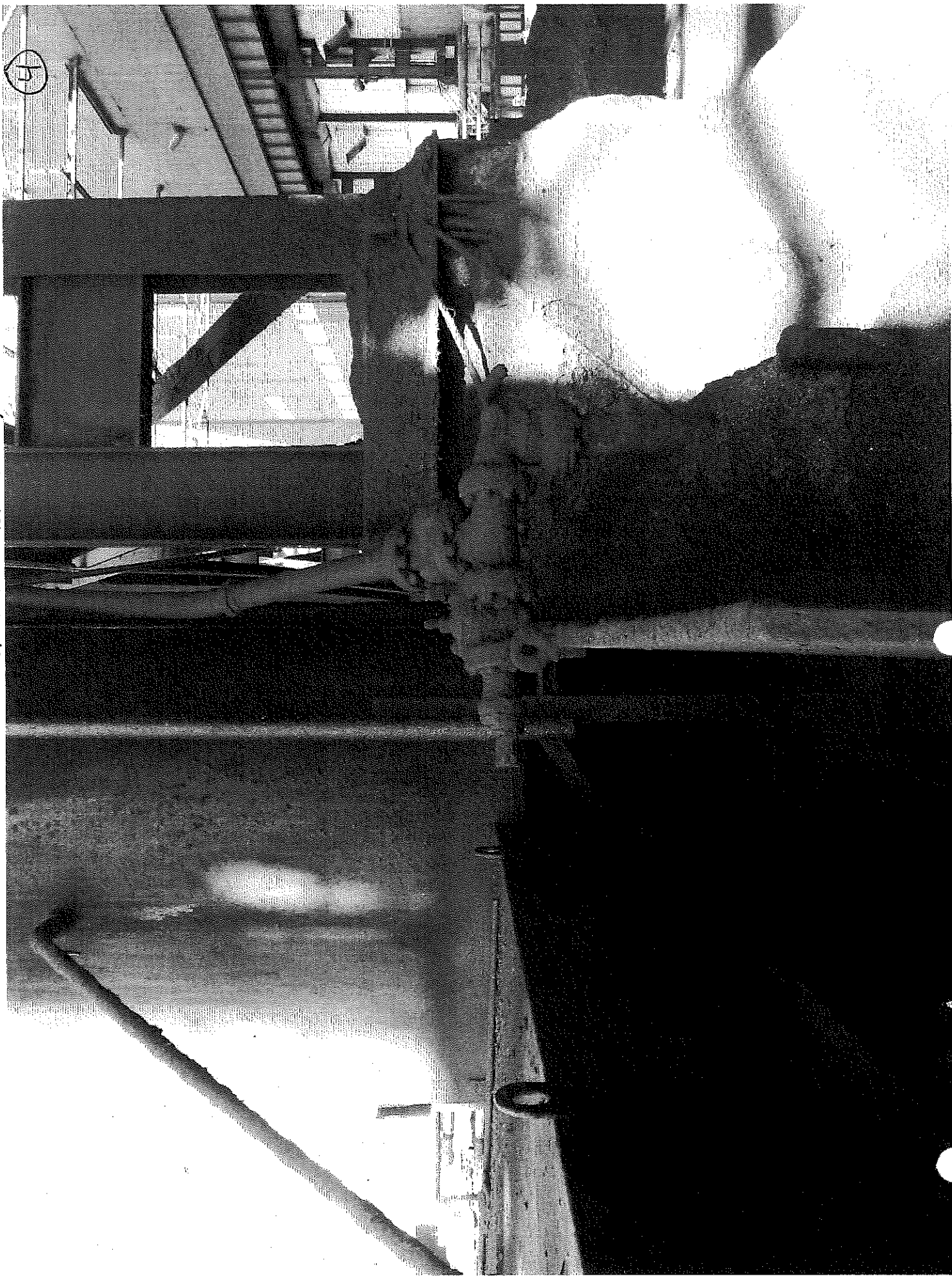


(Unmarked) Tanky Brake Water - Por - #2-

3

USED OIL

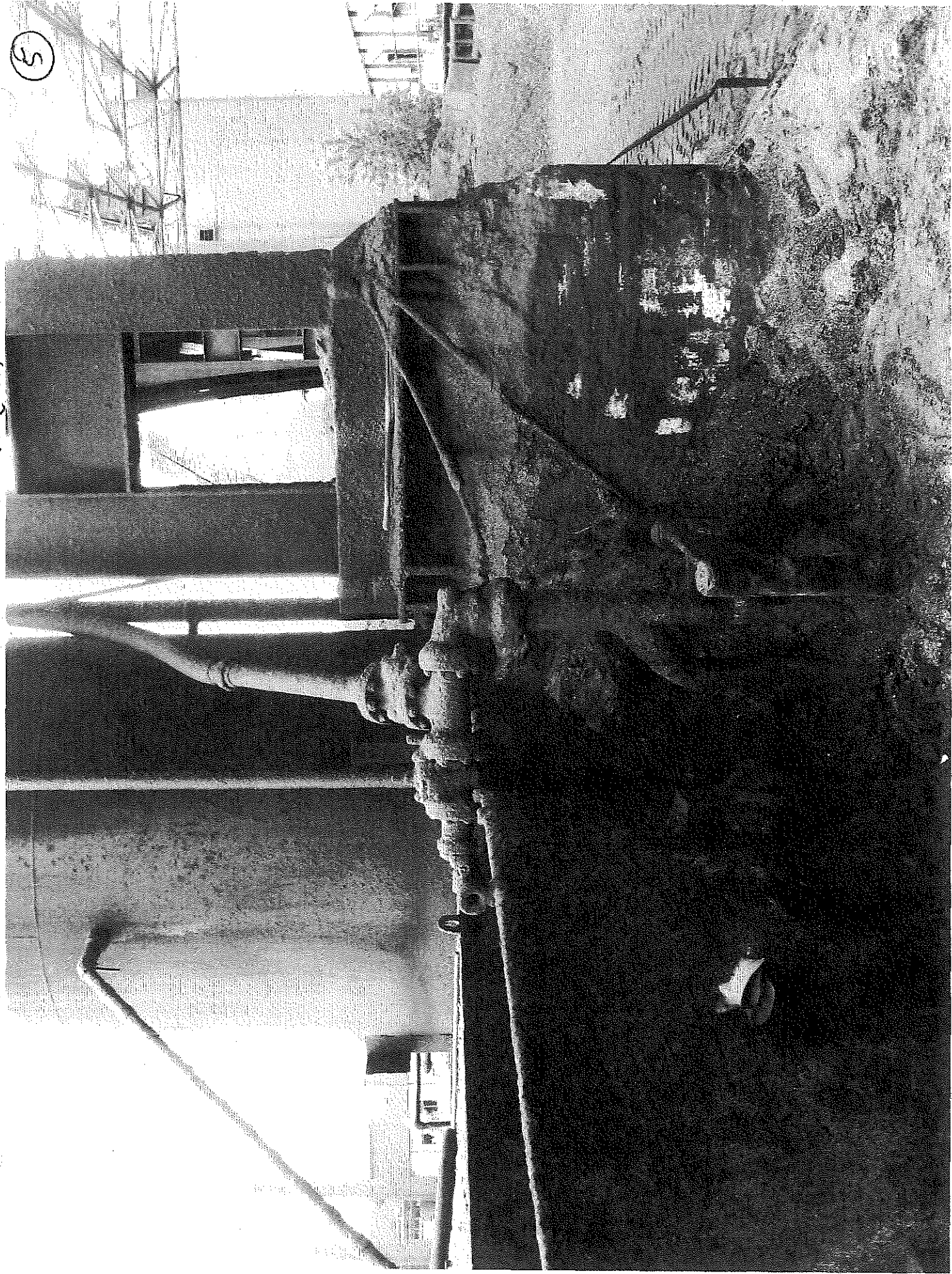
6/17/11 HSM (East) #06031 Tank



51

6/20/11 HSM(East) #06231 Tank

5

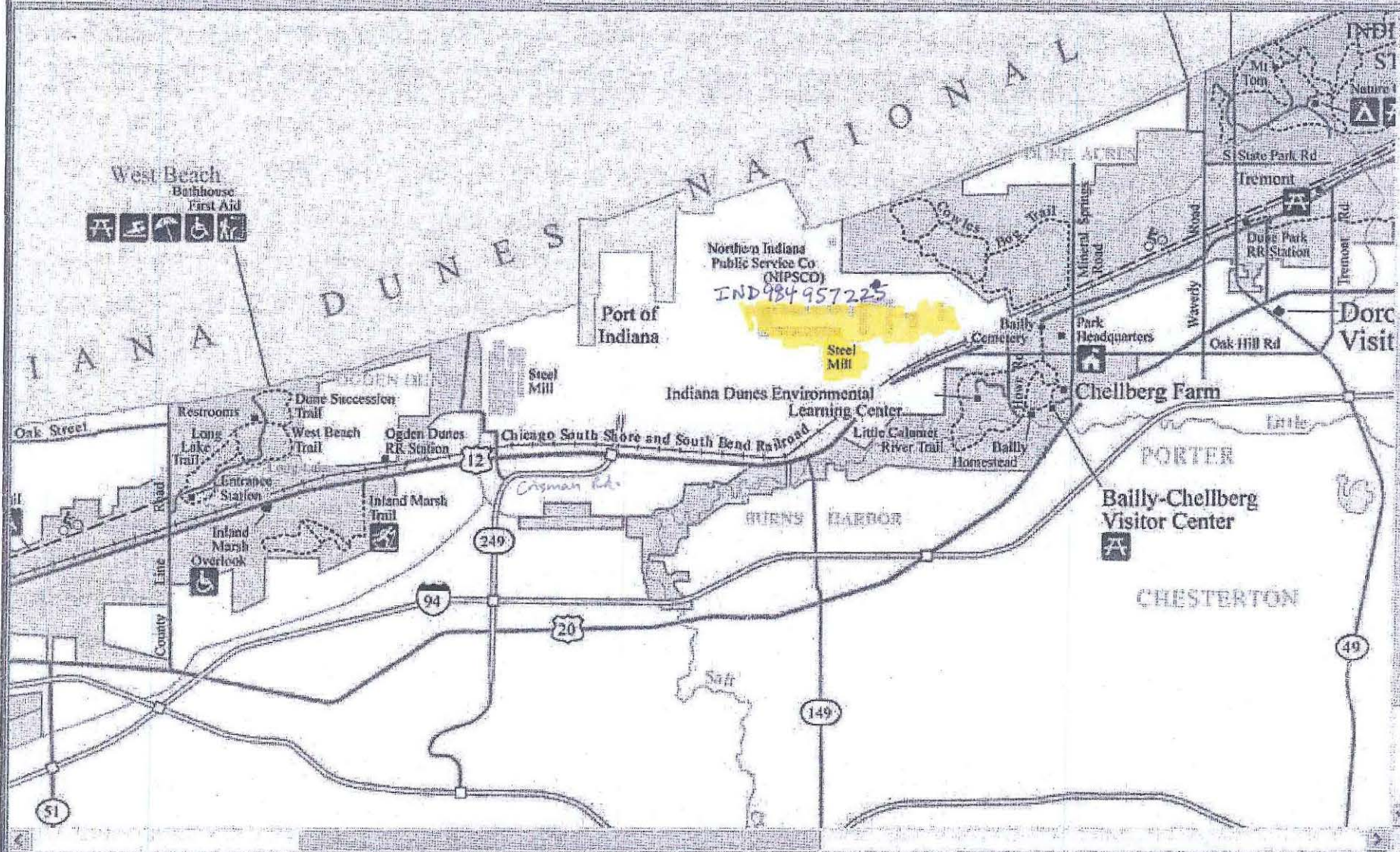


6/21/11 NSM (East) #06031 Tank



ATTACHMENT A

Aerial Photographs



Done

Internet

100%



IND 984957 225

1 A-2

Oct 3, 2008

Image USDA Farm Service Agency

19, 2008

41°38'11.57" N 87°08'43.52" W

elev 616 ft

Eye

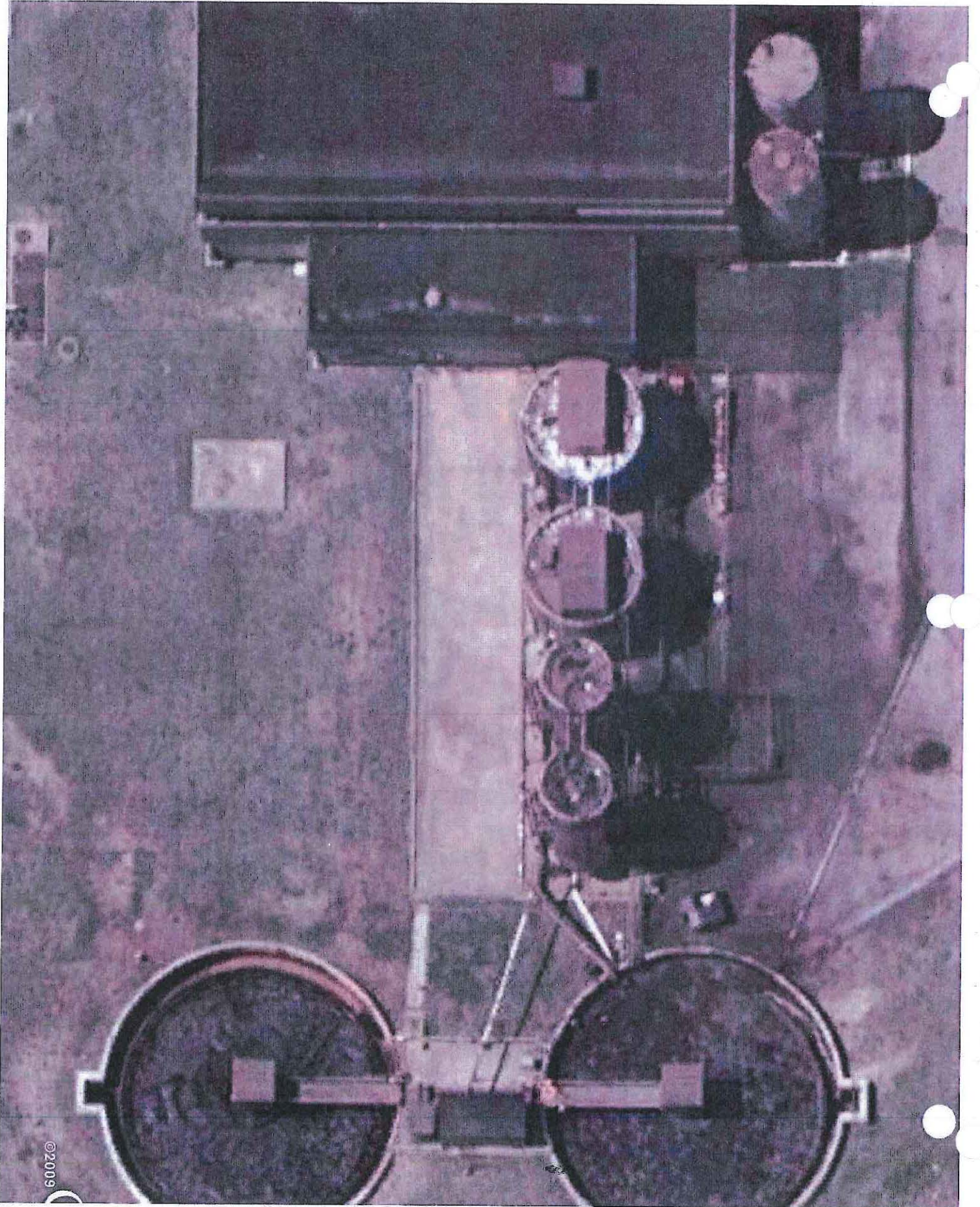
IND 984957 225

A-3



END 984 957 225

A-4



ATTACHMENT B

Photographs



Photo 032.

Date and time: June 17, 2011, 10:21 a.m.

Photographer: Sue Rodenbeck Brauer

Camera: Canon PowerShot SD790IS Digital Elph

Location: Northwest corner of oil separation building, looking east. Inspector John Gierczak is in the foreground, right side. Oil Technology, Inc.'s black horizontal tank is labeled "used oil." The Danger sign identifies a confined space--entry permit required, do not enter. Oil Technology Inc.'s filtration equipment is located inside the open door between the black tank and the pickup truck.

Oil Technology, Inc., EPA ID Number IND984957225
(An Onsite Contractor of ArcelorMittal Burns Harbor, LLC)

June 17, 2011

B-1



Picture 033.

Date and time: June 17, 2011, 10:21 a.m.

Photographer: Sue Rodenbeck Brauer

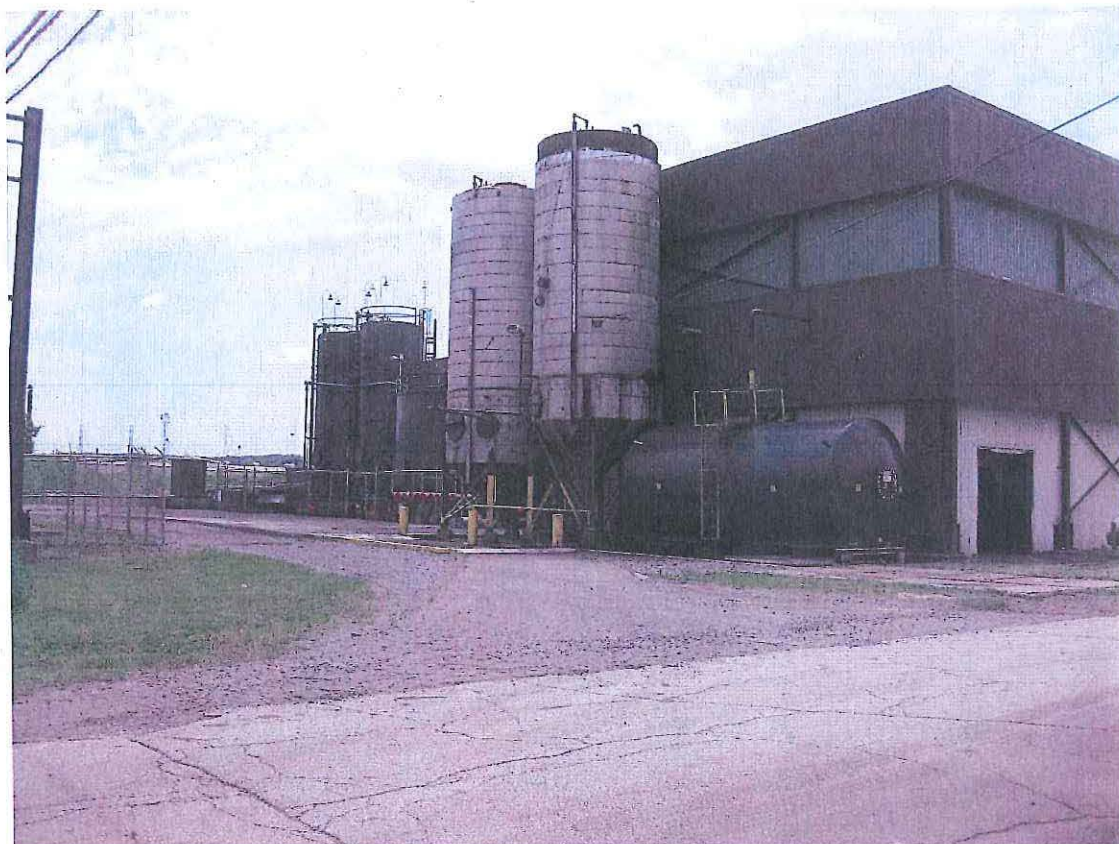
Camera: Canon PowerShot SD790IS Digital Elph

Location: Southwest corner of oil separation building, looking southeast. Inspector John Gierczak is in the foreground, left side. The tin plating line is in the background.

Oil Technology, Inc., EPA ID Number IND984957225
(An Onsite Contractor of ArcelorMittal Burns Harbor, LLC)

June 17, 2011

B-2



Picture 034. Date and time: June 17, 2011, 10:23 a.m.

Photographer: Sue Rodenbeck Brauer

Camera: Canon PowerShot SD790IS Digital Elph

Location: Northwest corner of oil separation building, looking southeast. Oil Technology Inc.'s black horizontal tank is labeled "used oil." It is vented to inside the building. The two vertical tanks east of the black tank are labeled PU08038 and PU08037.

Oil Technology, Inc., EPA ID Number IND984957225
(An Onsite Contractor of ArcelorMittal Burns Harbor, LLC)

June 17, 2011

B-3



Picture 033.

Date and time: June 17, 2011, 10:21 a.m.

Photographer: Sue Rodenbeck Brauer

Camera: Canon PowerShot SD790IS Digital Elph

Location: Southwest corner of oil separation building, looking southeast. Inspector John Gierczak is in the foreground, left side. The tin plating line is in the background.

Oil Technology, Inc., EPA ID Number IND984957225
(An Onsite Contractor of ArcelorMittal Burns Harbor, LLC)

June 17, 2011

B-4



Picture 036.

Date and time: June 17, 2011, 10:25 a.m.

Photographer: Sue Rodenbeck Brauer

Camera: Canon PowerShot SD790IS Digital Elph

Location: North of oil separation building, looking southeast. This tank farm is east of the oil separation building. The tank nearest the building is leased by Oil Technology, Inc. Drums of oil are emptied to a sump, and then the drums are stacked for reuse in the fenced area. Some of the drum bottoms are rusted. Original product and shipping labels are visible on some drums. The clarifiers are east of the tanks, and the north edge can be seen through the fence.

Oil Technology, Inc., EPA ID Number IND984957225
(An Onsite Contractor of ArcelorMittal Burns Harbor, LLC)

June 17, 2011

B-5



Picture 036.

Date and time: June 17, 2011, 10:25 a.m.

Photographer: Sue Rodenbeck Brauer

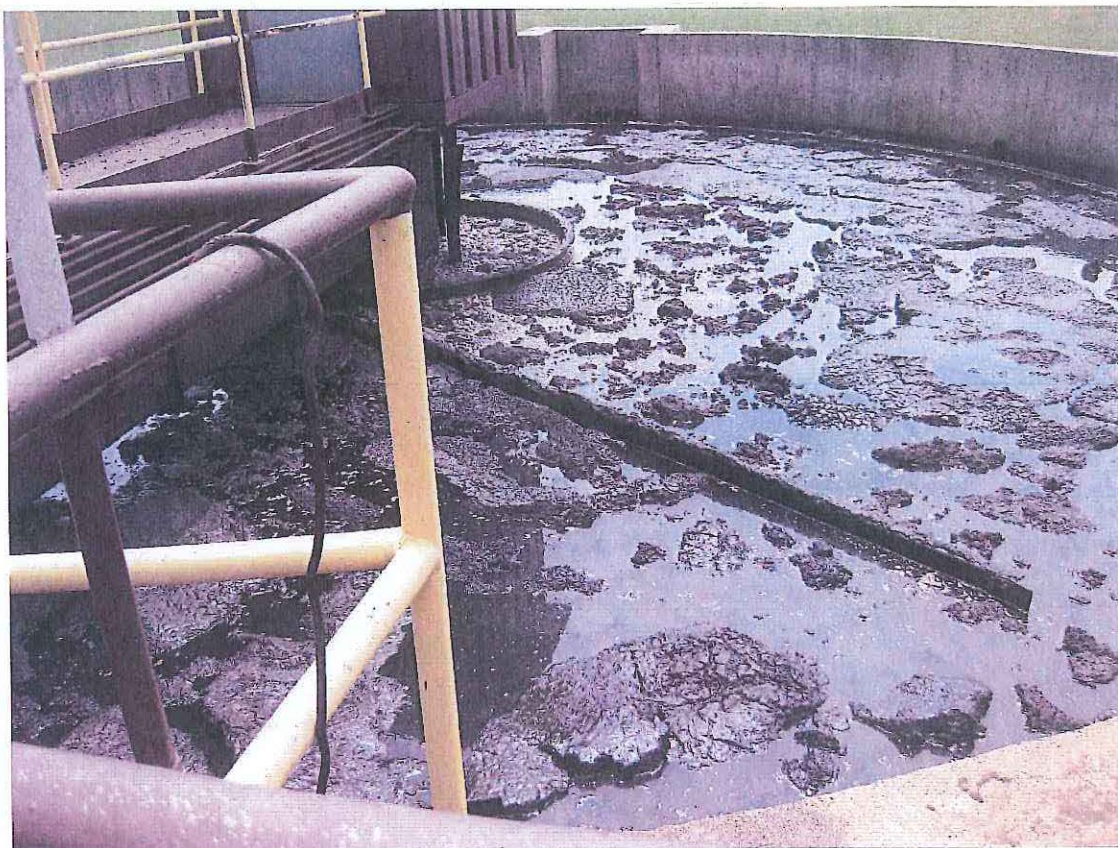
Camera: Canon PowerShot SD790IS Digital Elph

Location: North of oil separation building, looking southeast. This tank farm is east of the oil separation building. The tank nearest the building is leased by Oil Technology, Inc. Drums of oil are emptied to a sump, and then the drums are stacked for reuse in the fenced area. Some of the drum bottoms are rusted. Original product and shipping labels are visible on some drums. The clarifiers are east of the tanks, and the north edge can be seen through the fence.

Oil Technology, Inc., EPA ID Number IND984957225
(An Onsite Contractor of ArcelorMittal Burns Harbor, LLC)

June 17, 2011

B-6



Picture 038.

Date and time: June 17, 2011, 10:32 a.m.

Photographer: Sue Rodenbeck Brauer

Camera: Canon PowerShot SD790IS Digital Elph

Location: Clarifier at Oil Separation Plant. Nick Rovai has been with Oil Technology, Inc. for 20 years. He said the units "have never functioned as a clarifier would." Fluff, like from Cottonwood trees, sticks to the surface.

Oil Technology, Inc., EPA ID Number IND984957225
(An Onsite Contractor of ArcelorMittal Burns Harbor, LLC)

June 17, 2011

B-7



Picture 039.

Date and time: June 17, 2011, 10:33 a.m.

Photographer: Sue Rodenbeck Brauer

Camera: Canon PowerShot SD790IS Digital Elph

Location: South of clarifier at Oil Separation Plant. Looking west-northwest at oil separation plant vertical tanks. The tank legs are labeled PU08042 (closest to photographer), PU08041, PU0840, and PU0839 (next to building). Note the riveted tank construction. Tank PU08040 is labeled "used oil" (yellow sign).

Oil Technology, Inc., EPA ID Number IND984957225
(An Onsite Contractor of ArcelorMittal Burns Harbor, LLC)

June 17, 2011

B-8

ATTACHMENT C

Documents Copied During Inspection

OIL TECHNOLOGY, INCORPORATED
(AN ON-SITE CONTRACTOR OF ARCELORMITTAL BURNS HARBOR, LLC)
U.S. HIGHWAY 12
BURNS HARBOR, INDIANA 46304
MULTIMEDIA COMPLIANCE INSPECTION
DOCUMENTS/RECORDS REQUESTED
FOR REVIEW

In order to expedite the inspection, U.S. EPA would like the following information available upon meeting with Oil Technology, Incorporated:

1. Map and plot plan showing location(s) of on-site operations.
2. Description of on-site operations.
3. Process flow diagram(s) of on-site operations.

The documents and records listed below are requested to be made available for review during the inspection. In the event that some of the information requested does not apply, please explain the reason during the inspection.

CLEAN AIR ACT

1. List of all on-site air pollutant sources.
2. Plot plan showing location and identification of all major process areas and stacks.
3. Simplified process flow diagrams and description of pollution control equipment.
4. Permits and/or variances for air emission sources and related correspondence.
5. All required submittals to the Indiana Department of Environmental Management or U.S. EPA for the last three years.
6. Process and/or control equipment records required by permits.
7. Consent Decrees/Orders/Agreements in effect and related correspondence.
8. Excess emission reports for the past three years.
9. All visible emission readings and/or self-monitoring, required and non-required, for all sources within the past three years.
10. All stack tests conducted within the past five years.
11. All stack and ambient monitoring data for the last year.

RESOURCE CONSERVATION AND RECOVERY ACT – Hazardous Waste

1. Documentation to support the determination of whether any solid wastes generated are hazardous wastes and any analysis supporting the determination.
2. Manifests for any hazardous wastes transported or offered for transportation off-site, including Land Disposal Restriction notifications (last 3 years).
3. Biennial reports for shipping hazardous waste off-site to a treatment, storage, or disposal facility (last 3 years).
4. Exception reports for any manifests not received back from the designated facility (last 3 years).
5. Hazardous waste minimization plan(s).
6. Notifications for any hazardous waste intended to be exported.
7. EPA acknowledgment of consent for any exports of hazardous wastes.
8. Confirmation of delivery for any exports of hazardous wastes.
9. Annual reports from any primary exporting of hazardous wastes.
10. Current Contingency Plan(s).
11. Employee training records for hazardous waste handlers, including job titles and descriptions, name of each employee, and documentation of the type and amount of training each has received. Also, a copy of the hazardous waste training plan/program.
12. Emergency equipment testing logs.

13. Plot plan or other documentation showing locations of all less than 90 day hazardous waste accumulation areas and tank systems. Also identify locations of all waste generation points and satellite accumulation areas.
14. Inspection schedules and logs for all hazardous waste accumulation areas and tank systems (last 3 years).
15. Certified assessment of integrity for any existing hazardous waste tank systems that do not have secondary containment.
16. Certified assessment of design and construction for any new hazardous waste tank systems.
17. Certification of major repairs to hazardous waste tank systems.
18. Notifications of any hazardous waste releases to the environment.
19. Reports for any hazardous waste releases to the environment.
20. Summary reports and details of all incidents that required implementation of the contingency plan as specified under 40 CFR 279.52(b) in the Standards for the Management of Used Oil (last 3 years).
21. Records of each shipment of used oil sent off site (last 3 years).
22. Waste analysis plan for used oil.
23. Records and results of used oil analyses as described in the waste analysis plan for used oil (last 3 years).
24. Records of each used oil shipment accepted for processing/re-refining.
25. Records of each shipment of used oil that is shipped to a used oil burner, processor/re-refiner, or disposal facility (last 3 years).
26. For on-specification used oil fuel, analyses or other information documenting that the used oil meets the specifications for used oil fuel under 40 CFR 279.11 (last 3 years).
27. For on-specification used oil to be burned for energy recovery, shipment records cross-referencing records of used oil analysis or other information used to make the determination that the oil meets the specification as required under 40 CFR 279.72(a).
28. Date of construction for each tank used to process or store used oil.

RESOURCE CONSERVATION AND RECOVERY ACT – Underground Storage Tanks

1. List of all underground storage tanks (USTs) ever in operation, including tanks currently in operation, temporarily closed or permanently closed.
2. Notifications for any USTs.
3. Certifications for any new USTs.
4. Reports of any releases, spills, or overflows from USTs.
5. Reports summarizing initial abatement steps, site characterization, and free product removal at confirmed release sites.
6. Corrective action plans required as a result of any releases, spills, or overfills from USTs.
7. Notifications of any UST changes, upgrades, or closures.
8. Documentation of operation of any corrosion protection equipment required on USTs.
9. Documentation of any UST repairs.
10. Documentation for complying with any UST release detection requirements.
11. Results of any site investigations conducted upon closure of any USTs.
12. Financial responsibility documentation for USTs.

CLEAN WATER ACT

1. Current NPDES or Storm Water permit(s) and application(s).
2. Storm water management plan(s) and any other reports plans required by permit(s).
3. Current pretreatment ordinance(s)/permit(s)/administrative order(s) for wastewater discharges to the local POTW.
4. Any compliance order, schedule, or other enforcement actions issued in the last three years and related correspondence.
5. Any correspondence regarding exceedances of discharge limitations during the last three years.
6. Copies of self-monitoring report for NPDES discharges and discharges to any POTW (last 3 years).
7. BMR/90-day report for categorical Pretreatment Standards.

8. Periodic reports on continued compliance with categorical Pretreatment Standards for the last three years (40 CFR 403.12(e)).
9. Notifications of changed discharge and hazardous waste discharge to local POTW.
10. Slug discharge control plan(s).
11. Current SPCC plan(s) required by 40 CFR Part 112.

TOXIC SUBSTANCES CONTROL ACT

1. List or description of all polychlorinated biphenyl (PCB) items and all PCB storage areas.
2. Annual document required by 40 CFR 761.180(a) for the last three years.
3. Monthly inspection records for storage areas subject to 40 CFR 761.65.
4. PCB transformer and hydraulic systems inventory and PCB analyses.
5. Inspection and maintenance records for PCB transformers and hydraulic systems for the last three years.
6. Manifests for PCB items shipped off-site.
7. Certifications of Destruction for PCB Transformer disposal.
8. Data from any PCB analysis of used oil, wastewater, used oil fuel, sludge, or other material handled on site.

EMERGENCY PLANNING AND COMMUNITY RIGHT-TO-KNOW ACT

1. EPCRA notification of the State Emergency Response Commission (SERC).
2. Designated facility emergency coordinator.
3. List of all releases into the environment for the past three years.
4. Written follow-up emergency release notifications for the past three years.
5. Material Safety Data Sheet report to SERC, Local Emergency Planning Committee (LEPC), and fire department.
6. EPA Form R submittals for the past three years.
7. Tier I/Tier II submittals to the SERC, the LEPC, and Fire Department for the last three years.
8. A list of all chemicals on-site for the last three years and the maximum quantity in pounds for each year.



U.S. Environmental
Protection Agency, Region 5

Sue Rodenbeck Brauer
Environmental Scientist
Land and Chemicals Division

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Chicago, Illinois 60604

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Printed on 100% Post Consumer Paper



U.S. ENVIRONMENTAL PROTECTION AGENCY

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Telephone: 440-250-1713
Facsimile: 440-250-1750
Email: gierzak.john@epa.gov

Jeffrey May
Environmental Compliance Assurance Coordinator
Environmental
Maintenance, Environmental & Utilities

ArcelorMittal Burns Harbor
Flat Carbon

250 West US Highway 12
Burns Harbor, IN 46304-9745

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- ON SITE OIL RECYCLING -

OIL TECHNOLOGY, INC.

1203 SHEFFIELD
DYER, IN 46311

(219) 322-2724 x4
FAX (219) 322-1668

NJROVAI@yahoo.com

NICK ROVAI
SALES MANAGER

**SQUIRE
SANDERS**

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WORLDWIDE

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Not
dmcwilliams@ssd.com

c-4

OT#1



USED OIL MANAGEMENT REPORT

State Form 52392 (R/9-07)

Indiana Department of Environmental Management

COUNTY: PORTER
**FORM
UO**
RCRA ID I N D 9 8 4 9 5 7 2 2 5 REPORT YEAR 2009NAME OIL TECHNOLOGY, INC.LOCATION ADDRESS: ARCELORMITTAL BURNS HARBOR, US HWY 12, BURNS HARBOR, IN 46304

A. ENTER THE TOTAL QUANTITY OF USED OIL THAT WAS ACCEPTED FOR PROCESSING OR RE-REFINING

2 7 4 0 0 pounds kilograms ☒ short tons metric tons

B. ENTER A NAME AND DESCRIPTION FOR EACH PROCESS USED TO PROCESS OR RE-REFINE THE USED OIL.

PROCESS # 1	NAME	DEWATER AND FILTER USED OIL
	DESCRIPTION	HEATING, DECANTING AND SETTLING SYSTEM
PROCESS # 2	NAME	DEWATER AND FILTER LUBE OIL
	DESCRIPTION	HEATING, DECANTING AND SETTLING SYSTEM
PROCESS # 3	NAME	
	DESCRIPTION	

Comments _____

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to ensure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties under IC13-30-6-2 and Section 3008 of the Resource Conservation and Recovery Act for submitting false information, including the possibility of fine and imprisonment for knowing violations."

First Name : GeraldLast Name : PiperTitle: OwnerPhone # : 219-322-2724E-mail : Not Responsive

Signature _____

Date 11/12/10

(This form must be printed, signed, and sent in hard copy)

C-5

2009 Reportable in 2010 Biennial Report
Used Oil Management Report

Year	US Steel- Midwest		ArcelorMittal					
			Indiana Harbor, LLC (West)		USA, Inc. (East)		Burns Harbor	
	Gross	Net	Gross	Net	Gross	Net	Gross	Net
2009 (gals)	1,168,000	467,000	3,185,000	1,206,000	4,758,000	68,600	685,000	144,000
Water %	60%	40%	62%	38%	98.40%	1.60%	79%	21%
Density (lbs/gal)	8.0	7.5	8.1	7.5	8.3	7.5	8.0	7.5
Weight (lbs)	9,344,000		25,798,500		39,491,400		5,480,000	
Short Tons	4,672.0		12,899.3		19,745.7		2,740.0	

STRAIGHT BILL OF LADING— SHORT FORM

ORIGINAL — NOT NEGOTIABLE

Shipper's No. 220984957225

#3

Carrier's Name: OIL TECHNOLOGY INCCarrier's No. INR00001540

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of lading,

at 250 WEST US HWY 12 (Date) 1-13-11 FROM OIL TECH 40 ARCELOR MITTAL BURNINGHAM

the property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown, marked, consigned, and destined as shown below, which said company being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agree to carry to its usual place of delivery at said destination, if on its own railroad, water line, highway route or routes, or within the territory of its highway operations, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all the terms and conditions of the Uniform Domestic Straight Bill of Lading set forth (1) in the Uniform Freight Classification in effect on the date hereof, if this is a rail or rail-water shipment, or (2) in the applicable motor carrier classification or tariff if this is a motor carrier shipment. Shipper hereby certifies that he is familiar with all the terms and conditions of the said bill of lading, including those on the back hereof, set forth in the classification or tariff which governs the transportation of this shipment, and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

(Mail or street address for purposes of notification only.)

Consigned TO ARCELOR MITTAL / INDIANA HARBER EAST LINE PLANT 0643

On Collect on Delivery Shipments, the letters "C.O.D." must appear before consignee's name or as otherwise provided in item 430, Sec. 1.

Destination SAIO WATINA ST Street EAST CHICAGO City _____Lake _____ County IN State 46312 Zip _____Route BSR Delivery Address _____

(*To be filled in only when shipper desires and governing tariffs provide for delivery thereat.)

Delivering Carrier OIL TECHNOLOGY INC Car or Vehicle Initials and No. _____

Collect on Delivery \$ _____ And Remit to _____

Subject to Section 7 of conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:

The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

(Signature of consignor.)

C. O. D. Charges to be

Paid by

☐ Shipper ☐ Consignee

If charges are to be prepaid, write or stamp here, "To be Prepaid."

No. Packages	H.M.	Street	City	State
		Kind of Package, Description of Articles, Special Marks, and Exceptions	Weight (Subject to Correction)	Class or Rate
		USED OIL NON-REGULATED		
		DET MATERIAL	GROSS = 78.100	
			TARE = 28.500	
		H2O = .2 GNV = 7.673	NET 50.100	
		BSW = .1		

*If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is carrier's or shipper's weight.
NOTE—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.

The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding _____ per _____

Shipper, Per _____

Agent _____

Permanent post-office address of shipper.

EMERGENCY PHONE # 219.322.2724

Per _____

1

C-7

STRAIGHT BILL OF LADING—SHORT FORM

ORIGINAL — NOT NEGOTIABLE

Shipper's No. IND 0984957225Carrier's Name: Oil Tec IncCarrier's No. INR 11000540

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of lading,

at _____ (Date) 1-26-11 FROM Oil Tec c/o Arcelor M. Ind Bldg.

the property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as shown below, which said company (the word company being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its own railroad, water line, highway route or route, or within the territory of its highway operations, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all the terms and conditions of the Uniform Domestic Straight Bill of Lading set forth (1) in the Uniform Freight Classification in effect on the date hereof, if this is a rail or rail-water shipment, or (2) in the applicable motor carrier classification or tariff if this is a motor carrier shipment. Shipper hereby certifies that he is familiar with all the terms and conditions of the said bill of lading, including those on the back hereof, set forth in the classification or tariff which governs the transportation of this shipment, and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

(Mail or street address for purposes of notification only.)

Consigned TO Arcelor M. Ind Indiana Harbor Line Plant

On Collect on Delivery Shipments, the letters "COD" must appear before consignee's name or as otherwise provided in item 430, Sec. 1.

Destination 3210 Watkins Street E Chicago City _____
Lake County IN State 46312 Zip _____

Route _____ Delivery Address* _____

(A To be filled in only when shipper desires and governing tariffs provide for delivery thereat.)

Delivering Carrier Oil Tec Inc Car or Vehicle Initials and No. _____

Collect on Delivery \$ _____ And Remit to _____

No. Packages	H.M.	Street	City	State
		Kind of Package, Description of Articles, Special Marks, and Exceptions	*Weight (Subject to Correction)	Class or Rate
				Check Column
		Used oil non regulated		
		DOT Material		
			Gr 7740	
		H2O = .5	Trm 2900	
		B5W = 1.1	Net 48.400	

Subject to Section 7 of conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:

The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

(Signature of consignor.)

C. O. D. Charges to be

Paid by

☐ Shipper ☐ Consignee

If charges are to be prepaid, write or stamp here, "To be Prepaid."

Received \$ _____ to apply in payment of the charges on the property described herein.

Agent or Cashier

Per _____
(The signature here acknowledges only the amount prepaid.)

Charges Advanced:

\$ _____

† The fibre containers used for this shipment conform to the specifications set forth in the box maker's certificate thereon, and all other requirements of Rule 41 of the Uniform Freight Classification and Rule 5 of the National Motor Freight Classification.

Shipper's imprint in lieu of stamp, not a part of Bill of lading approved by the Interstate Commerce Commission.

*If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is carrier's or shipper's weight.
NOTE—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.

The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding _____ per _____

Shipper, Per _____ Agent

Permanent post-office address of shipper, _____

Emergency Phone 322 2324

Per _____

1

C-8

STRAIGHT BILL OF LADING— SHORT FORM

ORIGINAL — NOT NEGOTIABLE

Shipper's No. 21984457224

OT #5

Carrier's Name: oil Tec IncCarrier's No. INR 0000540

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of lading.

at US Highway 12 (Date) 2-23-11 FROM oil Tec c/o AM Burns Hub

the property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as shown below, which said company (the word company being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its own railroad, water line, highway route or routes, or within the territory of its highway operations, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all the terms and conditions of the Uniform Domestic Straight Bill of Lading set forth (1) in the Uniform Freight Classification in effect on the date hereof, if this is a rail or rail-water shipment, or (2) in the applicable motor carrier classification or tariff if this is a motor carrier shipment. Shipper hereby certifies that he is familiar with all the terms and conditions of the said bill of lading, including those on the back thereof, set forth in the classification or tariff which governs the transportation of this shipment, and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

(Mail or street address for purposes of notification only.)

Consigned TO Archer Mithal Indiana Huber Lane plan 1

On Collect on Delivery Shipments, the letters "COD" must appear before consignee's name or as otherwise provided in item 430, Sec. 1.

Destination 3210 Watling St Street East Chicago City IN State 46312 Zip

County Lake Delivery Address*

Route Oil Tech Inc (A To be filled in only when shipper desires and governing tariffs provide for delivery thereat.)Delivering Carrier Oil Tech Inc Car or Vehicle Initials and No. _____

Collect on Delivery \$ _____ And Remit to _____

Subject to Section 7 of conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:

The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

(Signature of consignor.)

C. O. D. Charges to be

Paid by

☐ Shipper ☐ Consignee

If charges are to be prepaid, write or stamp here, "To be Prepaid."

Received \$ _____ to apply in prepayment of the charges on the property described herein.

Agent or Cashier

Per _____
(The signature here acknowledges only the amount prepaid.)

Charges Advanced:

\$ _____

* The fibre containers used for this shipment conform to the specifications set forth in the box maker's certificate thereon, and all other requirements of Rule 41 of the Uniform Freight Classification and Rule 5 of the National Motor Freight Classification.

* Shipper's imprint in lieu of stamp: not a part of bill of lading approved by the Interstate Commerce Commission.

* If the shipment moves between two parts by a carrier by water, the law requires that the bill of lading shall state whether it is carrier's or shipper's weight.
NOTE — Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.

The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding _____ per _____

Shipper, Per Archer Mithal

Agent

Permanent post-office address of shipper.

Emerseyn phone 219 322 2724

Per

1

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STRAIGHT BILL OF LADING—SHORT FORM

ORIGINAL — NOT NEGOTIABLE

Shipper's No. IND 984937225

Carrier's Name:

Oil Tec IncCarrier's No. IND 00001540

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of lading,

at US Highway 12 (Date) 2/25/11 FROM Oil Tec C/O AM Busc Harbor

the property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as shown below, which said company (the word company being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its own railroad, water line, highway route or routes, or within the territory of its highway operations, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all the terms and conditions of the Uniform Domestic Straight Bill of Lading set forth (1) in the Uniform Freight Classification in effect on the date hereof, if this is a rail or rail-water shipment; or (2) in the applicable motor carrier classification or tariff if this is a motor carrier shipment. Shipper hereby certifies that he is familiar with all the terms and conditions of the said bill of lading including those on the back hereof, set forth in the classification or tariff which governs the transportation of this shipment, and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

(Mail or street address for purposes of notification only.)

Consigned TO Archer A. Hall Indian Harbor Line

On Collect on Delivery Shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1.

Destination 3210 W. 11th Street East Chicago City Ind County IN State 46312 ZipRoute Delivery Address* (*To be filled in only when shipper desires and governing tariffs provide for delivery thereat.)Delivering Carrier Oil Tec Inc Car or Vehicle Initials and No. _____

Collect on Delivery \$ _____ And Remit to _____

No. Packages	H.M.	Street	City	State
		used oil* non regulated		
		DOT material	gr 792W	
			tar 316W	
			net 416W	

*If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is carrier's or shipper's weight.
NOTE—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.

The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding _____ per _____

Permanent post-office address of shipper,

Emergency Phone 219 322 2724

Per _____

Subject to Section 7 of conditions, if this shipment is to be delivered to the consignee without recourse on the consignee, the consignee shall sign the following statement:

The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

(Signature of consignee.)

C. O. D. Charges to be

Paid by

☐ Shipper ☐ Consignee

If charges are to be prepaid, write or stamp here, "To be Prepaid."

Received \$ _____ to apply in prepayment of the charges on the property described herein.

Agent or Cashier

Per _____ (The signature here acknowledges only the amount prepaid.)

Charges Advanced:

\$ _____

†The fibre containers used for this shipment conform to the specifications set forth in the box maker's certificate thereon, and all other requirements of Rule 41 of the Uniform Freight Classification and Rule 5 of the National Motor Freight Classification.

‡Shipper's imprint in lieu of stamp; not a part of bill of lading approved by the Interstate Commerce Commission.

Shipper, Per _____

Agent _____

C-10

